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

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

**FILED**
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# KING CITY COMMUNITY POWER
# 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**

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

# KING CITY COMMUNITY POWER
# 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*, King City Community Power ("KCCP") submits its 2026 Integrated Resource Plan ("IRP"). KCCP's 2026 IRP includes a Standard Load-Serving Entity Plan narrative and a confidential Resource Data Template ("RDT") and Clean System Power ("CSP") Calculator. The RDT and CSP Calculator have been removed in their entirety and are being submitted to California Public Utilities Commission Staff via secure file transfer protocol.

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 the reporting organization herein, 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

KING CITY COMMUNITY POWER

2026 INTEGRATED RESOURCE PLAN

AUGUST 10, 2026

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# I. Executive Summary

King City Community Power ("KCCP" or "King City") is a Community Choice Aggregator ("CCA") formed under California Assembly Bill 117. KCCP began serving King City on July 2, 2018. It is estimated that KCCP's customers will consume approximately 38 gigawatt-hours ("GWh") per year of electricity. King City's broader goals are to offer electricity at low rates and from a higher percentage of renewable resources than otherwise required.

KCCP has submitted three templates in accordance with the California Public Utilities Commission's ("Commission" or "CPUC") requirements. KCCP used forecasted load data in combination with data provided by the Commission to construct and analyze its current and forecasted position regarding future greenhouse gas ("GHG") benchmarks as they pertain to KCCP's current and forecasted 2045 load. KCCP has submitted a Conforming Portfolio for the 8 million metric ton ("MMT") by 2045 GHG target, which is also its Preferred Conforming Portfolio, which meets KCCP's GHG benchmark as established in the Clean System Power ("CSP") Calculator. The Conforming Portfolio is consistent with KCCP's Resource Adequacy ("RA") and Renewables Portfolio Standard ("RPS") requirements.

# II. Study Design

For the purpose of this filing, KCCP used 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"), which lists KCCP's load as approximately 41.4 GWh in 2030. KCCP notes that this methodology holds each load-serving entity's ("LSE") share of California Independent System Operator ("CAISO") coincident peak demand constant across the planning horizon; as explained in the Lessons Learned section, KCCP believes this overstates its assigned forecast relative to the stable consumption of its residential and small commercial customer base. KCCP has not developed Alternative Portfolios, only a Conforming Portfolio.

KCCP has produced a Conforming Portfolio that addresses KCCP's proportional share of the 8 MMT by 2045 GHG target. The Conforming Portfolio uses KCCP's assigned load forecast as described in the IRP Ruling.

- The Conforming Portfolio achieves emissions equal to KCCP's 8 MMT 2045 GHG Emissions Benchmark.
- KCCP utilized its individual load assignment and adjusted its Resource Data Template ("RDT") to reflect the predominantly residential and small commercial composition of the load it serves.
- KCCP's Conforming Portfolio uses inputs and assumptions consistent with those to be used by staff to develop the Preferred System Plan.
    - KCCP did not utilize its own inputs and/or assumptions for capital cost and financing information.
- According to the completeness definition provided in the "Filing Requirements Overview" document, KCCP has completed all three filing items (RDT, CSP Calculator, and Narrative template).[1]

KCCP's Conforming Portfolio is also its Preferred Conforming Portfolio. KCCP's Preferred Conforming Portfolio is consistent with the state's GHG, renewable, reliability, and other statutory and Commission-mandated requirements and goals. KCCP referred to the most recent year-ahead cost allocation mechanism ("CAM") to create its Preferred Conforming Portfolio. KCCP accounted for its future RA needs based on the RA capacity value reflected in the year-ahead CAM list.

KCCP used its 2045 GHG Emissions Benchmark based on the planning target set by the IRP Ruling. KCCP has used the CSP methodology and calculator for estimating its GHG emissions across the Integrated Resource Planning ("IRP") horizon.

### a. Objectives

KCCP's objective is to compare its procurement to its current and future GHG benchmarks. Through the creation of the Portfolio referenced herein, KCCP analyzed its future needs and ability to serve its customers through least cost and renewable resources.

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

## b. Methodology

### i. Modeling Tool(s)

KCCP used the Commission's modeling tools – the CSP Calculator, RDT, and the load forecasts included in the IRP Ruling.

### ii. Modeling Approach

KCCP used the templates provided by the Commission in creating its Preferred Conforming Portfolio.

### iii. Alternative Assumptions

King City did not use any alternative assumptions.

# III. Study Results

As described above, KCCP developed one Preferred Conforming Portfolio addressing KCCP's proportional share of the 8 MMT by 2045 GHG target. KCCP did not deviate from the assumptions provided by the Commission in preparing the CSP, other than adjusting the "Commercial & Industrial Fraction of Baseline Demand" in the Demand Inputs tab to better reflect KCCP's predominantly residential and small commercial customer base. KCCP used its existing contracted procurement as a baseline for future resource projections.

## a. Conforming and Alternative Portfolios

KCCP's Conforming Portfolio addresses KCCP's proportional share of the 8 MMT by 2045 GHG target. KCCP has not developed any Alternative Portfolios. KCCP's Preferred Conforming Portfolio consists of:

- Existing resources that KCCP contracts with, consistent with definitions provided in the Resource Data Template;
- Existing resources that KCCP plans to contract with in the future;
- New resources that KCCP plans to invest in.

To date, KCCP has not contracted directly with new resources as it elected to "opt out" of self-procurement for its proportional share of the 3,300 megawatts ("MW") of procurement mandated by Decision ("D.") 19-11-016. KCCP is still investigating the procurement options associated with its very modest capacity procurement obligation established in D.21-06-035, D.23-02-040, and D.26-02-057 (collectively, the "Mid-Term Reliability Decisions"). Because the procurement obligations are very small, KCCP has challenges finding projects that will contract for a small slice at reasonable costs.

KCCP procures through a service provider that negotiates and contracts directly with resource owners, developers, and suppliers to meet KCCP's loads and satisfy its procurement obligations (RA, RPS, etc.). KCCP populated the CSP Calculator and RDT based on the resource options provided in the CSP.

KCCP's current contracted RA resources are primarily from thermal resources, located within the northern California region. For forecasting purposes, currently KCCP anticipates the continuation of these contractual relationships, and with the same general resource mix. This assumption is represented in KCCP's CSP Calculator template. KCCP's RPS generation consists primarily of wind and solar resources from California. For forecasting purposes, KCCP currently anticipates the continuation of these contractual relationships, and with the same resources, which is represented in KCCP's CSP Calculator template. KCCP does expect, however, that future RA contracts it can secure will include more battery storage capacity that is being developed throughout the CAISO territory to better utilize daytime solar production for delivery during the evening and night peak hours.

### b. Preferred Conforming Portfolio

KCCP offers its Preferred Conforming Portfolio for Commission approval. KCCP has used the Commission's CSP Calculator and RDT to create its Preferred Conforming Portfolio. As described in Public Utilities Code Section 454.52(a)(1), KCCP's Preferred Conforming Portfolio will put KCCP on a path to meet its: (1) GHG emissions reduction targets established by the California Air Resources Board; (2) 60% RPS target by 2030; (3) RPS program's 65% long-term procurement requirement; (4) goal to provide electricity to its

customers at the lowest reasonable cost; (5) near-term and long-term system and local RA requirements; (6) goal to minimize localized air pollutants and other GHGs, with early priority on disadvantaged communities; and (7) intent to satisfy other statutory requirements, such as strengthening the diversity, sustainability, and resilience of the bulk transmission and distribution systems, and local communities.[2]

### c. GHG Emissions Results

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

- 0.009 MMT per year for 2028;
- 0.008 MMT per year for 2030;
- 0.013 MMT per year for 2035;
- 0.015 MMT per year for 2040; and
- 0.010 MMT per year for 2045.

KCCP did not use a custom hourly load shape or GHG-free production profile in the CSP calculator.

### d. Local Air Pollutant Minimization and Disadvantaged Communities

#### i. Local Air Pollutants

KCCP has used the CSP Calculator to estimate the NOx, PM2.5, and $SO_2$ emissions associated with its Preferred Conforming Portfolio:

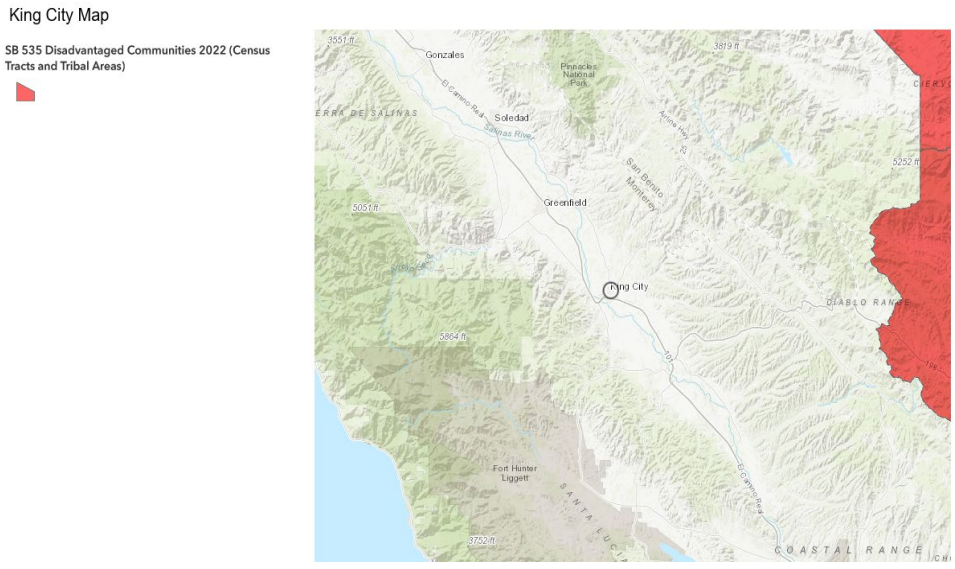
[2] *See* Pub. Util. Code Section 454.52(a)(1)(g).

| Emissions Total | *Unit* | 2028 | 2030 | 2035 | 2040 | 2045 |
|---|---|---|---|---|---|---|
| PM2.5 | *tonnes/yr* | 0.6 | 0.5 | 0.9 | 1.0 | 0.8 |
| $SO_2$ | *tonnes/yr* | 0.1 | 0.1 | 0.1 | 0.1 | 0.1 |
| NOx | *tonnes/yr* | 0.7 | 0.7 | 1.2 | 1.5 | 0.9 |

### ii. Focus on Disadvantaged Communities

As outlined by the Commission, a disadvantaged community ("DAC") is defined as "any community statewide scoring in the top 25 percent statewide or in one of the 22 census tracts within the top five percent of communities with the highest pollution burden that do not have an overall score, using the most recent version of the California Environmental Protection Agency's CalEnviroScreen tool."[3] As reported by KCCP in its May 1, 2024 Advice Letter KCCP-014-CCA, a careful review of CalEnviroScreen 4.0 showed that the area served by KCCP did not meet the definition of a DAC. However, the analysis is not limited to that one tool. KCCP reviewed the Senate Bill ("SB") 535 map as shown in Figure 1 below. Based on this review, KCCP does not see its customer base as within a DAC. Accordingly, as KCCP does not serve any disadvantaged communities, KCCP cannot address impacts to such disadvantaged communities.

**Figure 1: SB 535 Disadvantaged Communities Map**




[3] *See* D.18-02-018, p. 66, Conclusion of Law 14, and Ordering Paragraph 6. The most recent version of the tool, CalEnviroScreen 5.0, is available at https://oehha.ca.gov/calenviroscreen.

With respect to KCCP's commodity procurement impact on DACs generally, Pilot Power Group, LLC ("Pilot") is engaged by KCCP to manage its procurement contract portfolio and to meet applicable regulatory mandates. Pilot's broader procurement efforts and compliance with California's RPS and GHG procurement mandates, as well as efforts to minimize other localized air pollutants, are expected to benefit the state as a whole, including disadvantaged communities located near KCCP's service territory and California as a whole.

KCCP also reviewed the newer CalEnviroScreen 5.0, released by Cal EPA in July 2026. Figure 2 below is a screenshot of the King City footprint showing that it does not fall within the top 25% tracts.

**Figure 2: Screenshot from CalEnviroScreen 5.0 of King City Area**

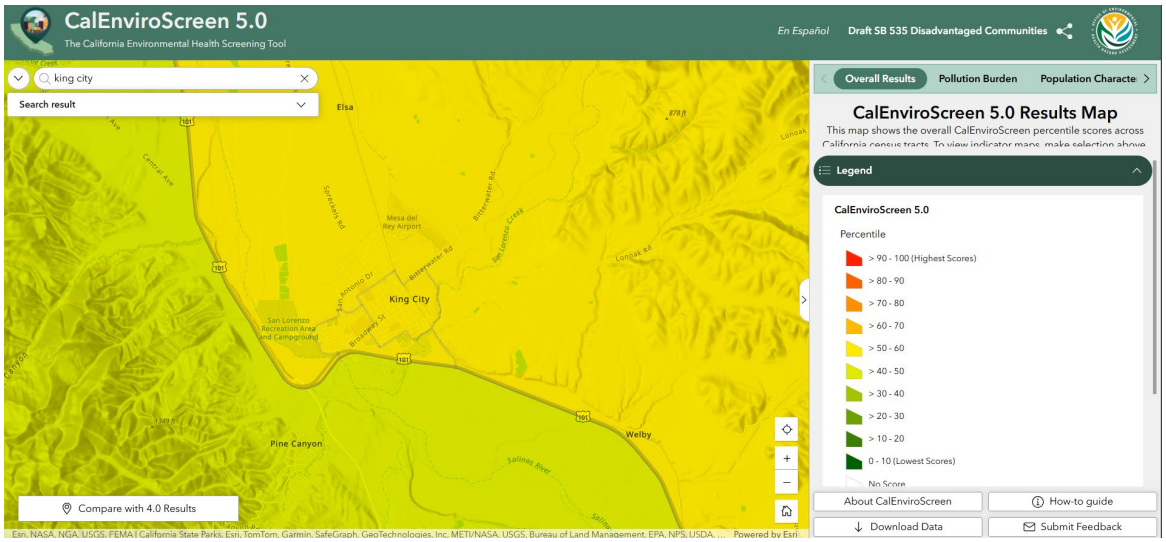
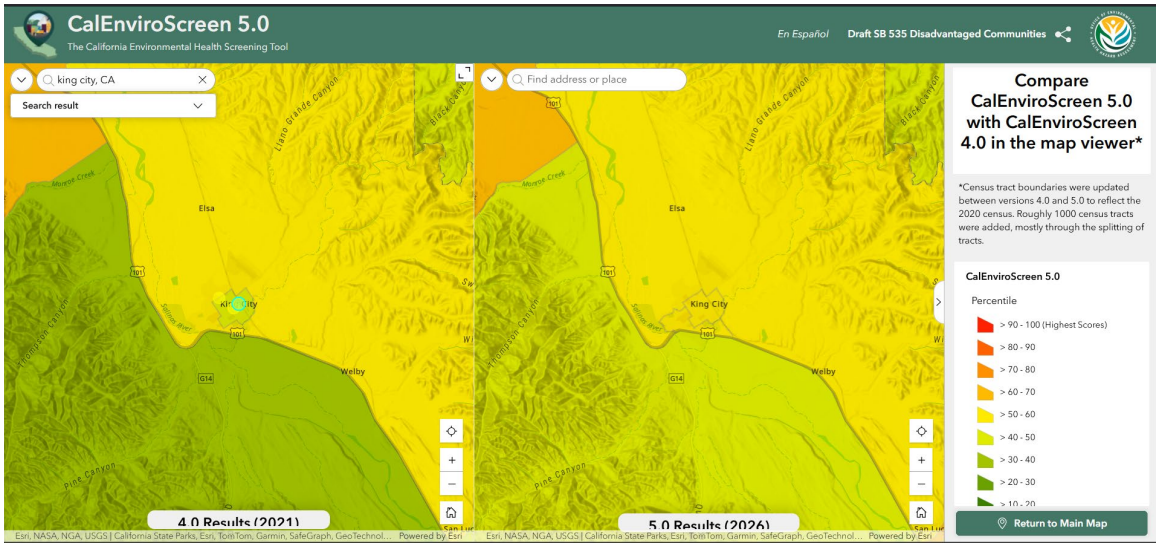



**Figure 3: Screenshot Comparing CalEnviroScreen 5.0 with 4.0 for the King City Area**



Based on its review of these two versions of the CalEnviroScreen models, the King City service territory does not meet the definition of a DAC.

## e. Cost and Rate Analysis

Under the direction of its Council Members and with the recommendation of its Advisory Committee, KCCP sets its rates in accordance with its approved financial policies. From time to time, KCCP may either offer discounts to Pacific Gas and Electric Company's ("PG&E") generation rates or set its rates equal to PG&E's generation rates, as KCCP procures resources consistent with its Preferred Conforming Portfolio.

***Requirements for IOUs Only***

Not applicable as KCCP is not an investor-owned utility.

***Requirements for All LSEs (including non-IOUs)***

KCCP is aware and responsive to the needs of the communities which it serves. KCCP works to remain competitive with PG&E's rates while balancing affordability and reliability for its customers. By choosing to only procure resources within the cost limitations of its customers, KCCP has prioritized cost-sensitive portfolios. While King City's service area is not considered a DAC, the area has higher poverty and lower educational attainment scores in CalEnviroScreen 5.0, which makes economic pressures high for its customers. This drives KCCP's desire to minimize costs as much as possible while striving for full compliance with Commission mandates.

## f. System Reliability Analysis

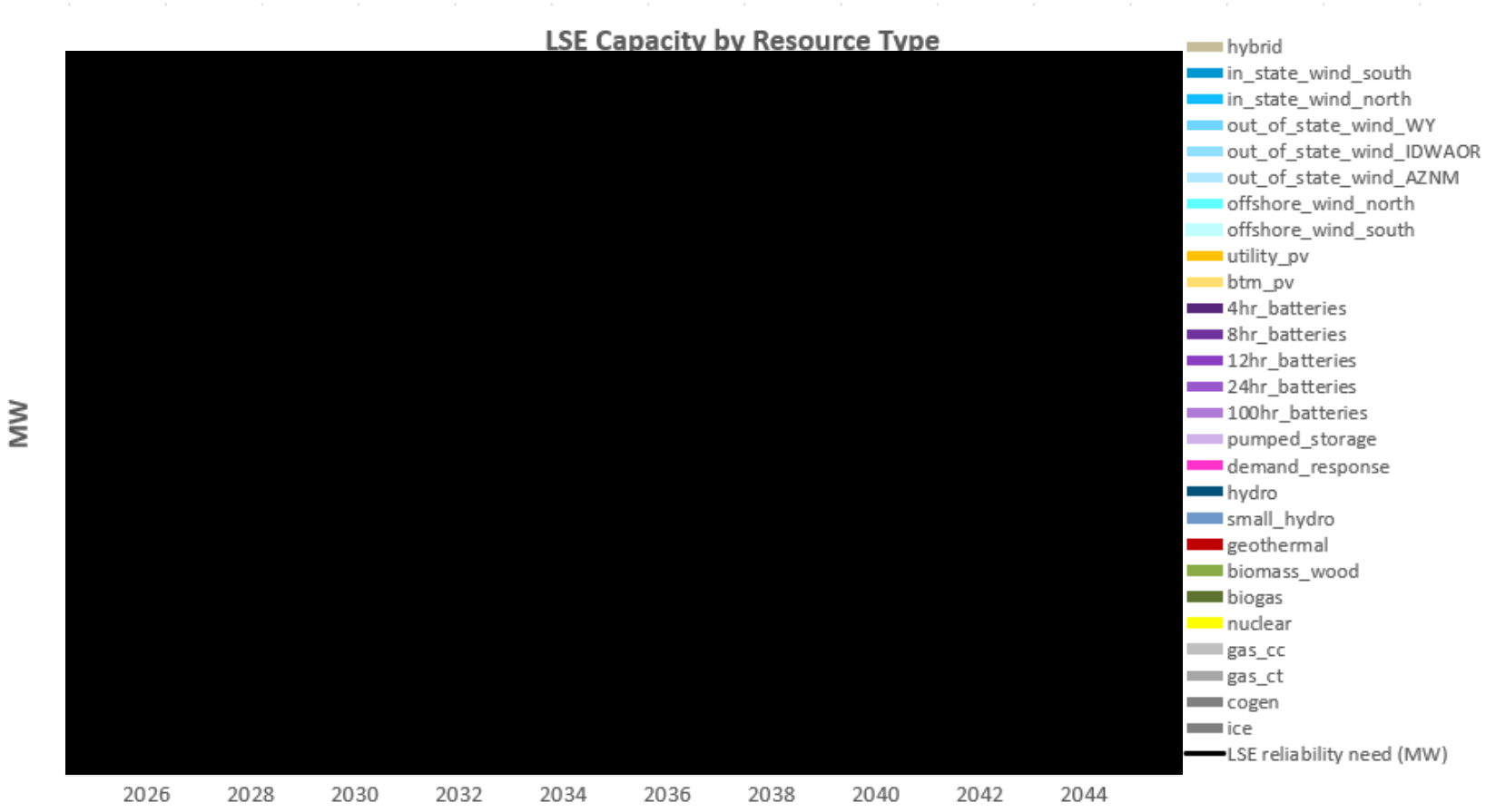
KCCP provides its System Reliability chart below (Load and Resource Table by Resource Type and by Contract Status), which come from KCCP's Resource Data Template. As evidenced in its RDT, KCCP does not anticipate any capacity shortages relative to its share of CAISO-managed coincident peak demand.

*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)** | [redacted] | | | | | | | | | | | | | | | | | | | |
| **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)** | [redacted] | | | | | | | | | | | | | | | | | | | |
| **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)

## g. Existing Resource Planning

In previous IRP cycles, KCCP noted its plan to provide its customers with the reliability of thermal resources and the environmental benefits of solar and winds resources. The current tight market for renewables procurement is partly due to both usual and extraordinary supply, permitting, interconnection, building, and other delays related to the development of new facilities. If supply chain, permitting, interconnection, building, or development delays persist in delaying the construction of sufficient new generating and/or transmission resources to enable satisfaction of the requirements of SB 100 on a state-wide basis, then KCCP's timely compliance will be severely and negatively impacted, including failure to achieve RPS procurement mandates and a corresponding renewable net short position and potential impacts to KCCP meeting its long-term procurement requirement.

KCCP reviewed the existing resources listed in its 2022 RDT to this year's submission. The 2022 RDT included CAM resources from PG&E and two contracts from its supplier, Pilot. Its 2026 RDT shows a similar portfolio including the long-term contracts with Pilot.

## h. Hydro Generation Risk Management

KCCP has not procured any hydro resources and has no current plans to do so.

## i. Long-Duration Storage Planning

KCCP has not procured any long-duration energy storage ("LDES") resources. KCCP will investigate options for LDES should such resources become available in the future at reasonable prices. Should LDES become available in the market with quantities and costs that align with its customers' demand, KCCP will investigate those opportunities.

## j. Clean Firm Power Planning

Because of the risks involved, KCCP has not explored contracting for new clean firm resources that are not yet operational. However, given California's policy direction to eschew combustion resources, KCCP anticipates exploring such options in the future for its relatively small customer base as those resource types become available. Pilot, on behalf of

KCCP, continues to focus on operational resources and looks at in-development resources as opportunities/compliance requirements arise.

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

Going forward, KCCP anticipates procuring additional renewable energy credits ("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 KCCP satisfy its Portfolio Content Category ("PCC") 1 procurement obligations cost effectively. However, as described throughout this IRP, KCCP is not in a position to make long-term procurement decisions for resources that are not currently deliverable into California.

### l. Offshore Wind Planning

KCCP is not currently investigating offshore wind opportunities. A number of projects previously considered for the California coast have been delayed or cancelled, and face pushback from the Federal government. Should such resources become available at reasonable costs in the future, KCCP will consider this technology.

### m. Transmission Planning

As outlined in its CSP Calculator template and RDT, KCCP secures its RA resources from PG&E with resources located in northern California. As KCCP procures from facilities that are already built and in operation or about to commence operation, it does not perform analysis of transmission development trends or timing of transmission buildouts when procuring resources.

## IV. Action Plan

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

### a. Proposed Procurement Activities and Potential Barriers

As described above, KCCP's Preferred Conforming Portfolio is consistent with the state's statutory and regulatory requirements. KCCP will pursue future procurement that reflects

a resource mix consistent with California policy requirements. As outlined in KCCP's Conforming Portfolio and RDT, KCCP plans to provide its customers with the reliability of thermal resources and the environmental benefits of solar, wind, and storage resources. In time, KCCP hopes to increase the proportion of its renewable resources consistent with SB 100 requirements. KCCP plans to target resources that are already in operation in future procurement efforts given that its modest needs will not support project development. However, KCCP will procure from new resources as mandated by the Commission and where developers will offer small slices of larger projects. KCCP finds that it has minimal risk in achieving its Preferred Conforming Portfolio at this time.

KCCP monitors production under its procurement contracts to ensure that counterparties meet their obligations. If RPS generation under a contract is lower than expected, KCCP should have time to procure any additional resources that may be required.

KCCP will use forecasts of future customer demand to procure resources in accordance with the state's statutory and regulatory requirements. Because KCCP is a very small load-serving entity, it does not have sufficient customer load to justify the building of new generation facilities. KCCP, therefore, contracts with facilities that are already built and in operation or about to commence operation. This approach should greatly reduce the risk of non-compliance due to operating delays. KCCP does not foresee that delays related to the development of new facilities will prevent KCCP from procuring according to its Preferred Conforming Portfolio at this time. Rather, the challenge to date has been finding the modest levels of procurement required at reasonable costs.

The timing and type of procurement undertaken depends on KCCP's specific needs as well as the state of the market. For example, KCCP will seek to procure specific resources as needed (e.g., RA and RPS) and will seek out cost-effective resources when available. Specific negotiations and negotiation strategies with resource developers and suppliers are confidential, particularly given the Commission's limited jurisdiction over CCAs and lack of oversight over retail transactions by CCAs.

As described above, KCCP generally contracts with facilities that are already built and in operation or about to commence operation. This approach reduces or eliminates risks associated with permitting, interconnection, building, and other delays related to the development of new facilities that could delay KCCP's procurement. KCCP does not anticipate that any of the resources from which it procures or expects to procure from in the future are expected to be retired any time that would impact KCCP's ability to achieve its procurement objectives.

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

KCCP'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.

As noted above, KCCP has not procured any LDES resources. KCCP continues to investigate options for LDES, and, should LDES become available in the market with quantities and costs that align with its customers' demand, KCCP will investigate those opportunities.

KCCP has not procured any zero-emitting generation paired with storage or compatible with demand response resource requirements. KCCP continues to investigate options for zero-emission generation paired with energy storage should such resources become available in the future at reasonable prices.

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

As noted above, KCCP 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.

KCCP acknowledges the significant amount of out-of-state wind being brought online in recent months. Contracting has proven difficult and KCCP regularly monitors evolving resource developments and Requests for Offers.

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

Not applicable. KCCP 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

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

### iv. Other energy storage not described above

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

### v. Other demand response not described above

KCCP does not operate a demand response program for its territory.

### vi. Other energy efficiency not described above

KCCP does not offer an energy efficiency program in its territory.

### vii. Other distributed generation not described above

KCCP has no plans for distributed energy systems in its territory.

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

As a CCA, KCCP has no additional plans for investing in or increasing transportation electrification. To the extent its customers' loads increase with such electrification, KCCP will endeavor to serve those loads in a cost-effective manner as they become reflected in customer load forecasts. It should be noted that due to its small size, the CEC's IEPR does not forecast a transportation electrification level specific to King City.

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

KCCP has no additional plans for building electrification.

#### x. Potential Centralized Procurement, pursuant to AB-1373

KCCP's Preferred Conforming Portfolio does not currently rely on centrally procured long lead-time resources. Should the Department of Water Resources ("DWR") successfully conduct the centralized procurement identified in D.24-08-064 – offshore wind, geothermal, and long-duration storage – KCCP would be allocated a share of those resources' capacity, energy, and associated attributes, as determined by the Commission across all jurisdictional LSEs. KCCP 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. KCCP would continue to procure the balance of its RA, RPS, and GHG requirements through its service provider on a best-fit, least-cost basis.

For a small CCA in KCCP's position, centralized procurement offers a genuine benefit: it could give KCCP's customers access to long lead-time resources that KCCP cannot practically contract for bilaterally in the modest quantities it is assigned – the same constraint that led KCCP to opt out of self-procurement under D.19-11-016 – while spreading the development, financing, and performance risk of those resources across all load. At the same time, because the costs are allocated to all LSEs on a non-bypassable basis, the net value to KCCP's cost-sensitive residential and small commercial customers depends 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 of these emerging resource types. KCCP 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

KCCP has no plans for additional procurement requirements outside of what is already described above.

### b. Disadvantaged Communities (DACs)

See previous comments in Section III.d – KCCP does not have any DACs within its service territory

### c. LSEs' Tribal Customers

King City Community Power has no tribal customers at the moment, and does not presently market its services to tribal customers as a specific customer category. KCCP welcomes any customer that KCCP is licensed to serve, irrespective of whether it has a tribal affiliation or not. To date, KCCP has not made any special, specific outreach to tribes.

### d. Procurement Products

KCCP's procurement centers on physical products that directly satisfy its RA, RPS, and energy obligations, supported by standard credit instruments. KCCP 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). KCCP does not use financial derivatives or transact through financial exchanges. The products KCCP 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 KCCP'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 KCCP's RPS quantity, portfolio-balance, and long-term procurement requirements. |
| Energy storage capacity | Capacity and RA attributes from battery storage resources, where contracted. |

KCCP's procurement is exclusively physical and bilateral. It does not use electric or gas financial products, hedging derivatives, or exchange-traded instruments. KCCP 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, KCCP 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 KCCP directly. KCCP 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 investor-owned utility processes.

### e. Commission Direction of Actions

KCCP 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

KCCP 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. The methodology holds each LSE's share of CAISO coincident peak constant, so KCCP's obligation grows in step with the system peak forecast — now rising sharply from electrification and new data center load. KCCP's load is not growing. It serves a stable community of residential and small commercial customers with an already-high participation rate, leaving little room for enrollment growth and keeping consumption essentially flat. Pegging its share to a system peak driven by loads KCCP does not serve overstates its forecast and forces it to procure for demand that will not materialize.

KCCP asks that the Commission and CEC attribute forecast load growth to the load types actually driving it and let LSEs substantiate forecasts that reflect their real customer base rather than scaling each LSE's share to total system peak. Accurate attribution sharpens the Preferred System Plan, avoids steering scarce clean resources toward demand that will not appear, and keeps costs off customers who are not causing the growth – consistent with the cost-causation and affordability principles the Commission applies elsewhere.

2. Workable procurement pathways for small LSEs. Small LSEs are often assigned volumes too small to transact efficiently, since developers favor larger volumes and fewer offtakers – which can leave a small LSE unable to contract on workable terms despite real effort. KCCP asks the Commission to preserve and develop practical pathways for small LSEs: voluntary aggregation, standardized small-tranche products, and the option (not obligation) to use centralized or backstop procurement where bilateral contracting is impractical, while preserving each LSE's ability to self-procure. It further asks that any compliance or penalty framework be calibrated to small LSEs assigned modest volumes, so it drives real procurement rather than penalizing outcomes outside their 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 | King City Community Power Clean System Power calculator workbook "kccp_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 "kccp_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) | King City Community Power |
| The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse_names" tab | KCCP |

| **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 |