

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

Agenda ID: 19440
RESOLUTION E-5143
June 3, 2021

R E S O L U T I O N

Resolution E-5143. Updates a citation program initiated by Resolution E-4257, and updated by E-4720, authorizing California Public Utilities Commission (CPUC) staff to penalize retail sellers for non-compliance with mandatory filing deadlines and reporting requirements of the Renewables Portfolio Standard (RPS).

PROPOSED OUTCOME:

- This resolution updates Resolution E-4720's citation rules and penalty amounts for non-compliance with mandatory filing deadlines and reporting requirements of the Renewables Portfolio Standard (RPS).

SAFETY CONSIDERATIONS:

- There are no safety considerations implicated with this resolution.

ESTIMATED COST:

- There are no costs associated with this resolution.

This Resolution is made on the CPUC's own motion.

SUMMARY

This Resolution updates a citation program under the administration of CPUC staff (Staff) to enforce compliance with Renewables Portfolio Standards (RPS) reporting and filing requirements. Approval of these updates to the RPS citation program will create penalties for non-compliance with the CPUC's requirements for submission of RPS Procurement Plans (RPS Plans), as well as penalties for non-compliance with RPS reporting requirements and non-responsiveness to requests for information by Staff related to the implementation and administration of the RPS program.

The citation program applies to retail sellers subject to the CPUC's RPS reporting and filing requirements. Staff will be delegated authority to draft and issue citations for specific violations as set forth in Appendix A. Penalties may be levied for failure to submit RPS Compliance Reports or RPS Plans at the time or in the manner required, or failure to provide information to Staff at the time or in the manner required. Nothing in this Resolution alters, or reduces the CPUC's existing authority to implement and administer the RPS program.

BACKGROUND

California's Renewables Portfolio Standard (RPS) Program was established by Senate Bill (SB) 1078, and has been subsequently modified by SB 107, SB 1036, SB 2 (1X), SB 350¹ and expanded in again in 2018 under Senate Bill 100 (de León).

According to the Public Utilities Code, all retail sellers (investor owned utilities (IOUs), community choice aggregators (CCAs) and electric service providers (ESPs)) serving electricity load in California must participate in the RPS program and are subject to the same terms and conditions.² This includes the RPS Plan requirement laid out in RPS legislation, which instructs the CPUC to “direct each electric corporation to annually prepare a renewable energy procurement plan...to satisfy its obligations under the renewables portfolio standard,” as well as “require other retail sellers to prepare and submit renewable energy procurement plans... .”³ The schedule for filing RPS Plans is set out by an Assigned Commissioner Ruling in the RPS proceeding (currently R.18-07-003). RPS Plans provide the CPUC a detailed look at various aspects of the retail sellers' portfolio planning and procurement strategies to meet the RPS requirements.

The RPS Plans process requires retail sellers to file “draft” RPS Plans for review and adoption by the CPUC. If upon the CPUC's review, however, a retail seller's RPS Plan must be modified or is rejected, the retail seller is directed to submit a

¹ SB 1078 (Sher, Chapter 516, Statutes of 2002); SB 107 (Simitian, Chapter 464, Statutes of 2006); SB 1036 (Perata, Chapter 685, Statutes of 2007), SB 2 (1X) (Simitian, Chapter 1, Statutes of 2011); SB 350 (de León, Chapter 547, Statutes of 2015).

² Public Utilities Code Section 399.12(j)(1)(2)(3).

³ Public Utilities Code Section 399.13(a)(1)

“final” RPS Plan that adheres to the specifications outlined in the Decision on RPS Plans. Throughout this process, the retail seller may submit a motion to update their RPS Plan, and/or fix the errors in their Final RPS Plan submission. It is imperative that the CPUC receives draft RPS Plans in a timely manner, as well as any CPUC-approved follow-on updates or edits.

This Resolution updates and replaces Resolution E-4720, which updated a citation program authorizing CPUC staff to fine retail sellers for non-compliance with mandatory filing deadlines and reporting requirements of the RPS program.

DISCUSSION

CPUC Authority to Enforce a Citation Program

Pub. Util. Code Section 399.13(e) authorizes the CPUC to enforce compliance with the RPS program. Public utilities are subject to enforcement actions and penalties pursuant to Pub. Util. Code Sections 2102-2105, 2107, 2108, and 2114. Electric service providers are subject to enforcement action pursuant to these same code sections as if they were public utilities.⁴ Community choice aggregators are subject to enforcement action pursuant to Pub. Util. Code Section 2111.⁵

A citation program encourages complete and timely filings of draft and final RPS Plans, and the additional documentation necessary for Energy Division staff to examine the retail sellers’ portfolio planning strategies to ensure that these retail sellers are on course to meet current and future RPS requirements. A citation program will also encourage complete and timely responses to requests for information from CPUC staff that are related to the implementation and administration of the RPS. Under California law, including Pub. Util. Code Section 7, the CPUC may delegate authority to its staff to perform designated functions. A citation program administered by CPUC staff for specified violations will allow prompt action by CPUC staff.

The issuance of a citation for a specified violation is not mandatory. In the alternative, the CPUC may initiate any authorized formal proceeding or pursue

⁴ Pub. Util. Code Section 394.25.

⁵ The list in this paragraph is not meant to be exhaustive and the CPUC may rely on any other applicable laws or regulations that apply.

any other remedy authorized by the CPUC Enforcement and Penalty Assessment Policy (Enforcement Policy),⁶ California Constitution, the Public Utilities Code, other state or federal statutes, court decisions or decrees, or otherwise by law or in equity. Finally, the CPUC's enforcement of this Resolution by informal proceedings, formal proceedings, or otherwise, does not bar or affect the remedies otherwise available to other persons or government agencies. This citation program is consistent with other approved citation programs (e.g., the Resource Adequacy and Integrated Resource Planning citation programs).⁷

A retail seller may appeal a citation received through the Renewables Portfolio Standard Citation Program. Resolution ALJ-377, on April 28, 2020, provides retail sellers an avenue for disputing citations. Updates to the RPS citation rules are also included to be consistent with these modified appellate rules.

Background for Citations Related to RPS Plans

In its administration of the RPS program, Energy Division staff has made itself available to retail sellers to ensure complete and timely RPS Plans filings. Specifically, Energy Division staff is available to answer questions and aid retail sellers in their filing of timely and complete RPS Plans. Furthermore, retail sellers have more than one opportunity to file a satisfactory RPS Plan. First, retail sellers submit *draft* RPS Plans and are later allowed a chance to cure any defects after the final Decision on RPS Plans is issued. The final Decision on RPS Plans informs retail sellers of specific deficiencies in their plans that must be updated or improved.

Nevertheless, in recent years some retail sellers have failed to demonstrate the ability to reliably submit draft RPS Plans or the final RPS Plans consistent with the final Decision on RPS Plans. In the past some retail sellers have submitted deficient draft RPS Plans and missed filing deadlines. For instance, in D.19-12-042, the Commission rejected 12 out of the 26 CCA Draft RPS Plans and 16 out of 18 ESP Draft RPS Plans as deficient, thereby ordering the missing information in

⁶ The CPUC adopted an Enforcement and Penalty Assessment Policy (Enforcement Policy or Policy) by Resolution M-4846 on November 5, 2020. The Enforcement Policy does not modify any of the Commission's citation programs, nor does it create a disincentive to issuing citations or adding new citation programs. Nothing in the Enforcement Policy restricts or reduces the CPUC's, and its staff's, ability to use its existing enforcement tools and procedures, such as citation programs, but provides additional enforcement options for CPUC staff.

⁷ Integrated Resource Planning: Resolution E-5080; Resource Adequacy: Resolution E-4195.

their Final 2019 RPS Plan submission. The CPUC could have pursued enforcement action and penalties if deficiencies ordered in D.19-12-042 were not corrected in the retail sellers' final RPS Plans, but this would entail considerable time and resources and could require multiple new adjudicatory proceedings.⁸ While CPUC Staff expects to require a certain amount of information or corrections from some retail sellers between draft RPS Plans and final RPS Plans, far too many retail sellers failed to provide the most basic information. It is in these cases, where retail sellers fail to provide information in either its draft or final RPS Plan, that CPUC Staff may rely on this RPS Citation process to ensure compliance. That a retail seller submits a document purporting to be its draft or final RPS Plan is not, on its own, sufficient to meet RPS Plans filing requirements. CPUC Staff needs the discretion to find a retail seller's draft or final RPS Plans filing lacking statutorily-required elements and to cite that retail seller for failing to submit its RPS Plan. As Resolution E-4720 demonstrably contributed to improved, more timely RPS compliance filings, this Resolution is intended to raise the quality and timeliness of RPS Plans to aid in the CPUC's long-term procurement planning functions and its renewable procurement reporting requirements to the Legislature.

Current Process for Establishing RPS Plans Citation Program

In Assigned Commissioner and Assigned Administrative Law Judge's Ruling Identifying Issues and Schedule of Review for 2020 Renewables Portfolio Standard Procurement Plan (May 6, 2020), the CPUC sought comments from parties on the merits of amending the current RPS citation program. Commission Staff proposed to begin a process wherein the RPS citation program will expand to include issuing citations for non-compliant Draft and Final RPS Plans. The Ruling invited Parties to comment on the issues Staff should consider before developing a proposal to expand the current RPS citation program, as well as respond to a series of questions related to challenges meeting RPS Plans filing deadlines, possible changes to citation program, and reasonable penalty amounts. The CPUC received comments on July 29, 2020 from a number of parties and has considered those comments in initiating this draft Resolution.⁹

⁸ See Pub. Util. Code Sections 2101-2105, 2107, 2108 and 2114.

⁹ The following parties submitted comments: Alliance for Retail Energy Markets (AReM), American Wind Energy Association California Caucus (AWEA), California Public Advocates Office (CalPA), Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company (Joint IOUs), City of Rancho Mirage, City of San Jacinto,

While parties generally supported or did not object to the expansion of the RPS Citation program,¹⁰ parties will again have an opportunity to comment on this draft Resolution, the procedure for which is set out below, and the CPUC will take these comments into consideration as well.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Please note that comments are due 20 days from the mailing date of this Resolution. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this Resolution was neither waived nor reduced. Accordingly, this draft Resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

FINDINGS

1. Pub. Util. Code Section 399.13(a)(1) requires retail sellers to submit RPS Plans meeting certain criteria.
2. The schedule for filing Renewables Portfolio Standard Procurement Plans is set out by an Assigned Commissioner Ruling in the RPS proceeding (currently R.18-07-003).
3. The CPUC has authority to enforce compliance with the Renewables Portfolio Standard program.
4. The CPUC has the power and duty to act as an enforcement agency and, in the exercise of that duty, to ensure that penalties

Apple Valley Choice Energy, City of Baldwin Park, City of Santa Barbara, San Diego Community Power, City of Commerce, City of Pomona, East Bay Community Energy, Silicon Valley Clean Energy Authority, Sonoma Clean Power Authority, Valley Clean Energy Alliance, Redwood Coast Energy Authority, Solana Energy Alliance, City of Lancaster, City of Pico Rivera (Joint CCAs), and Shell Energy North America (US), L.P. (Shell).

¹⁰ AReM at 2, AWEA at 5, CalPA at 2, Joint IOUs at 2, Joint CCAs at 5, and Shell at 7.

- are promptly prosecuted and collected pursuant to Public Utilities Code Section 2101.
5. Public utilities are subject to CPUC enforcement action and penalties pursuant to Public Utilities Code Sections 2102-2105, 2107, 2108 and 2114.
 6. Pursuant to Public Utilities Code Section 394.25, electric service providers are subject to CPUC enforcement action pursuant to Public Utilities Code Sections 2102-2105, 2107, 2108 and 2114 as if they were public utilities.
 7. Community choice aggregators are subject to enforcement action pursuant to Public Utilities Code Section 2111.
 8. Under California law, including Public Utilities Code Section 7, the CPUC may delegate authority to its Staff to perform certain functions.
 9. Delegation of authority to CPUC staff to issue citations and levy Scheduled Penalties for Specified Violations will encourage compliance with the RPS program reporting requirements.
 10. The Scheduled Penalties set forth in Appendix A are reasonable, will encourage complete and timely filings of RPS Plans, and will encourage complete and timely responses to requests for information from CPUC staff that are related to the implementation and administration of the RPS program.
 11. The proposed procedures for the citation program ensure due process, fairness, and efficiency in the application of the citation program.

THEREFORE, IT IS ORDERED THAT:

1. The citation program and the Scheduled Penalties for the Specified Violations, as described in Appendix A, are hereby adopted.
2. Authority is delegated to CPUC staff to issue citations and levy Scheduled Penalties for the Specified Violations set forth in

- Appendix A to enforce compliance for all retail sellers subject to the CPUC's Renewables Portfolio Standard reporting requirements.
3. The issuance of a citation for a Specified Violation is not mandatory, and, in the alternative, the CPUC may initiate any formal proceeding authorized by the California Constitution, the Public Utilities Code, other state and federal statutes, court decisions or decrees, the CPUC's Rules of Practice and Procedure, and/or prior CPUC orders, decisions, rules, directions, demands or requirements, and pursue any other remedy authorized by the California Constitution, the Public Utilities Code, other state or federal statutes, court decisions or decrees, or otherwise by law or in equity.
 4. Nothing in this Resolution bars or affects the rights or remedies otherwise available to other persons or government agencies.
 5. Resolution E-5143 is enacted and replaces Resolution E-4720.
 6. Resolution E-5143 is effective today.

This Resolution is effective today.

I certify that the foregoing Resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 3, 2021; the following Commissioners voting favorably thereon:

RACHEL PETERSON
Executive Director

APPENDIX A

Renewables Portfolio Standard Citation Program

1.0 Specified Violations and Scheduled Penalties

1.1 “Specified Violation” means the failure, absent an approved extension, to submit: (a) a Routine Renewables Portfolio Standard (RPS) Compliance Report at the time or in the manner required; (b) a Verified RPS Compliance Report at the time or in the manner required; and (c) a Draft RPS Procurement Plan (RPS Plan) at the time or in the manner required; (d) a Final RPS Procurement Plan at the time or in the manner required; other supporting data required by Staff that is related to the implementation and administration of the RPS program.

1.2 “Scheduled Penalties” for Specified Violations are set forth in Appendix A.

1.3 Modification of Scheduled Penalties. Scheduled Penalties may be modified by Resolution.

2.0 Procedures for Citation Program

2.1 Citations for Specified Violations. After appropriate informal investigation and verification that a Specified Violation defined in this Resolution has occurred, CPUC staff is authorized to issue a citation. The Specified Violations and the corresponding Scheduled Penalty that may be levied are described in this Appendix.

2.2 Service of Citations. Citations shall be sent by CPUC staff by first class mail to the Respondent at the address of the agent for service of process.

2.3 Content of Citations. Citations shall state the alleged violation, the evidence supporting the alleged violation, and the proposed Scheduled Penalty. The citation may summarize the evidence and CPUC staff shall make the evidence available for timely inspection upon request by the Respondent. Citations also shall include an explanation of how to file an appeal of the citation, including the explanation of a right to have a hearing, to have a representative present at the hearing, and to request a transcript. With each issued citation, Staff must serve a copy of Resolution ALJ-377 and the Rules adopted pursuant to that Resolution’s Appendix A.

2.4 Response to Citation. A Respondent may either: (1) accept the citation and the Scheduled Penalty; or (2) appeal the citation.

2.5 Submitted to CPUC staff. Unless otherwise specified, “notify CPUC staff,” “submitted,” or “submit” means to send a written communication by the U.S. Mail or an express mail service to the address specified in the order or citation that requires the filing or notification. These written communications are not filed with the CPUC’s Docket Office. In addition to or instead of communications by mail service, CPUC staff may require electronic submissions.

2.6 Acceptance of Scheduled Penalty. In the event the proposed Scheduled Penalty is accepted, the Respondent shall notify CPUC staff in writing and shall pay the penalty in full as set forth in subsection 2.8, below within thirty (30) days of the date of the citation.

2.7 Appeal of Citation. In lieu of accepting the Scheduled Penalty, a Respondent may appeal the citation and request a hearing. In the event of an appeal, any remedy available may be imposed, and the remedy shall not be mandated by or limited to the Scheduled Penalty.

2.7.1. Notice of Appeal. To appeal a citation, the Respondent must file a written Notice of Appeal with the CPUC’s Docket Office. The Notice of Appeal for a Citation Appeal must be served, at a minimum, on the Chief Administrative Law Judge (with an electronic copy to: ALJ_Div_Appeals_Coordinator@cpuc.ca.gov), on the Director of the Safety and Enforcement Division, and on the Director of Energy Division. The Notice of Appeal must state the date and dollar amount of citation, attach a copy of the citation, indicate the rationale for appeal, and be filed with CPUC staff within thirty (30) days of the date of the citation.¹¹

2.7.2. CPUC Staff’s Response to Notice of Appeal. In response to a Citation Appeal, Staff will file a copy of the document that gave rise to the citation and a complete copy of the citation, including all attachments, that is being appealed with the CPUC’s Docket Office, Chief Administrative Law Judge and Appellant no later than fourteen business days after the Notice of Appeal is filed. The Response to Notice of Appeal must be served on the Chief Administrative Law Judge (with an electronic copy to: ALJ_Div_Appeals_Coordinator@cpuc.ca.gov) and appellant on the same

¹¹ For a Citation Appeal, the parties to the appeal will be respondent and Staff which issued the citation which is appealed. Other interested persons may be placed on the information only section of the service list.

day the Compliance Filing is filed. Staff must serve Respondent with the Response to Notice of Appeal and file a proof of service to this effect at the same time it files the Response to Notice of Appeal.

2.7.3. Extension of Time to File the Notice of Appeal. There shall be no extension of time to file a Notice of Appeal for citations issued pursuant to the RPS Citation Program.

2.7.4. Referral to Administrative Law Judge. The Chief Administrative Law Judge shall designate an Administrative Law Judge to hear the appeal within a reasonable time of receipt of the Response to Notice of Appeal.

2.7.5. Time of Hearing. No less than ten (10) days after the assignment of an Administrative Law Judge, that Administrative Law Judge shall set the matter for hearing. The Administrative Law Judge may, for good cause shown or upon agreement of the parties, grant a reasonable continuance of the hearing.

2.7.6. Exchange of Information. No later than three business days prior to the scheduled hearing on a Citation Appeal, the parties must exchange all information they intend to introduce into the record at the hearing which is not included in the citation or the Compliance Filing already filed with the CPUC. The information exchange is not to be filed with the CPUC or served upon the Administrative Law Judge or other decision makers. The Administrative Law Judge may request a copy of that exchange of information.

2.7.7. Location of Hearing. Appeals of citations shall be heard in the CPUC's hearing venue in San Francisco (SF) or Los Angeles (LA), at the Commission's discretion. The Administrative Law Judge may change the location of the hearing.

2.7.8. Transcripts. The Respondent may order a transcript of the hearing, and shall pay the cost of the transcript in accordance with the CPUC's specified procedures.

2.7.9. Obtaining an Interpreter. Upon a good faith showing of language difficulty and written request to the assigned Administrative Law Judge and the CPUC's Public Advisor's Office not less than five business days prior to the date of the hearing, the respondent will be entitled to the services of an interpreter at the CPUC's expense.

2.7.10. Representation at Hearing. The Respondent may be represented at the hearing by an attorney or other representative, but any such representation shall be at the Respondent's sole expense.

2.7.11. Evidentiary Hearing. At an evidentiary hearing, CPUC staff bears the burden of proof and, accordingly, shall open and close. The Administrative Law Judge may, in his, her, or their discretion to better ascertain the truth, alter the order of presentation. Rule 13.6 (Evidence) of the Commission's Rules of Practice and Procedure applies to evidence presented.

2.7.12. Submission. Ordinarily, the matter shall be submitted at the close of the hearing. The Administrative Law Judge, upon a showing of good cause, may keep the record open for a reasonable period to permit a party to submit additional evidence or argument.

2.7.13. Decision. The Administrative Law Judge shall issue a draft Resolution resolving the appeal not later than sixty (60) days after the appeal is submitted in accordance with subsection 2.7.12, and the draft Resolution shall be issued for public comment and placed on the first available agenda, consistent with the CPUC's applicable rules.

2.7.14. Rehearing. A Resolution resolving an appeal is subject to rehearing and judicial review.

2.7.15. Communications. From the date that a citation is issued to and including the date when the final order is issued, neither the Respondent nor CPUC staff, or any agent or other person on behalf of the Respondent or CPUC staff, may communicate regarding the appeal, orally or in writing, with a Commissioner, a Commissioner's advisor, or an Administrative Law Judge.

2.8 Payment of Scheduled Penalties. Payment of Scheduled Penalties shall be submitted to the CPUCs Fiscal Office, 505 Van Ness Avenue, San Francisco, CA 94102, in the form of certified check, payable to the 'California Public Utilities Commission for credit to the State General Fund.'

2.9 Default. If the Respondent: (a) notifies CPUC staff of acceptance of a Scheduled Penalty and fails to pay the full amount of the Scheduled Penalty within thirty (30) days of the date of the written acceptance of the Scheduled Penalty; or (b) fails to notify CPUC staff of acceptance of a Scheduled Penalty or fails to file a written Notice of Appeal in the manner and time required, the citation and penalty shall become final and the Respondent be considered in default. Upon default, any unpaid balance of a Scheduled Penalty shall accrue

interest at the legal rate of interest for judgments [Code of Civil Procedure Section 685.010], and CPUC staff and the CPUC may take any action provided by law to recover unpaid penalties and ensure compliance with applicable statutes and CPUC orders, decisions, rules, directions, demands, or requirements.

2.10 Reporting. CPUC staff shall regularly report to the CPUC on actions taken pursuant to this Resolution. The report shall include a summary of the citations and penalties imposed, penalties paid, and the disposition of any appeals.

SPECIFIED VIOLATIONS AND SCHEDULED PENALTIES

SPECIFIED VIOLATION	SCHEDULED PENALTY
Failure to submit an Annual RPS Compliance Report, the Project Development Status Report (where applicable) ¹² and the Verified Final RPS Compliance Report at the time required. ¹³	\$500, plus \$500 per day for the first ten days the submission is late and \$1,000 for each day thereafter. ¹⁴
Failure to submit an annual Draft RPS Procurement Plan (RPS Plan) or the annual Final RPS Plan at the	\$500, plus \$500 per day for the first ten days the submission is late and \$1,000 for each day thereafter. ¹⁶

¹² As of August 1, 2014, the Director of Energy Division has implemented a process for each large IOU to submit its project development status report information through the Energy Division RPS contract database. This Resolution only applies to the reports that are submitted pursuant to D.12-06-038, OP 34 and 35.

¹³ Notice by staff that a filing is late or not in the format required does not extend the time within which the penalties are calculated and requests by staff to cure any deficiency within a specified time also does not alter the time within which the penalties are calculated.

The CPUC acknowledges that a Compliance Report may be missing so much of the required information that it crosses into being considered a late filing, but refrains from opining as to the standard to judge that at this time. A request by staff for additional documentation and/or information also does not preclude requests for other documentation and/or information or a finding that the Report is late.

¹⁴ The ten (10) day periods throughout this Resolution are counted from the first business day after the filing is due and every business day thereafter.

¹⁶ The ten (10) day periods throughout this Resolution are counted from the first business day after the filing is due and every business day thereafter.

time required with the required elements. ¹⁵	
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SPECIFIED VIOLATION	SCHEDULED PENALTY
Failure to comply with a request for information or documentation from CPUC staff that is related to implementation of the RPS program in the time or in the format required. ¹⁷	\$500, plus \$500 per day for the first ten days the submission is late and \$1,000 for each day thereafter. ¹⁸

¹⁵ The CPUC has established a process for issuing an annual schedule outlining when draft RPS Plans filings are due. This schedule is issued within the proceeding via Assigned Commissioner Ruling, as well as any updates to that schedule throughout the year. For reference, the previous Assigned Commissioner Ruling can be found on the CPUC’s RPS procurement website (https://www.cpuc.ca.gov/Utility_Scale_RFO/) and the R.18-07-003 proceeding Docket (<https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO>). Thereafter, the Decision on RPS Plans sets the due date for retail sellers that need to submit final RPS Plans. The CPUC also provides ample resources for retail sellers who must file RPS Plans, such as the CPUC’s Practitioner’s Resource website: https://www.cpuc.ca.gov/practitioner_page/.

¹⁷ See footnote 15.

¹⁸ See footnote 18.