

# Characterizing AB 1373 Allocations in LSE Preferred Conforming Portfolios for 2024-26 IRP Cycle Filing Requirements

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## **Purpose and Current Commission Guidance:**

This document is intended to provide guidance to LSEs for characterizing AB 1373 resources in their 2026 IRP plans. LSEs are not required to include AB 1373 resources specified through D.24-08-064 in their 2024-26 IRP preferred conforming portfolio. However, the guidance provided in this document can be used by those LSEs that wish to do so. The CPUC released maximum individual AB 1373 allocations with the 2024-2026 Filing Requirements. LSEs were provided with individual workbooks that included peak demand forecasts, Critical Hour Load Shares, Reliability Procurement requirements, and AB 1373 allocations. The AB 1373 allocations that were provided and this supplemental guidance gives LSEs the needed elements for them to incorporate these resources into their portfolios.

Prior guidance was provided to LSEs through an ALJ Ruling and the 2024-26 Filing Requirements Narrative Template. The January 16, 2026 ALJ Ruling that set requirements for the 2024-26 IRP cycle plans described that “the purpose of these indicative allocations is to give LSEs an idea of how the Commission will allocate any centrally procured resources, if procurement is successful, in the outer years of the planning horizon.” Additionally, Section IV: Action Plan of the Filing Requirements Narrative Template described that “*LSEs should describe and provide specific details on any changes to their preferred conforming portfolio and contract planning strategy should the Department of Water Resources (DWR) be successful in conducting the centralized procurement of long lead time (LLT) resources as set forth in D.24-08-064.*”

## **Supplemental guidance:**

To enable LSEs who would like to incorporate AB 1373 allocations into their IRP portfolios, staff provide supplemental guidance here, which is separated into two parts. The first provides forecasted online delivery timing, associated procured quantities, and hypothetical contract start and end dates for all AB 1373 resource allocations that were specified in D.24-08-064. The second describes how the resources should be characterized in the Resource Data Template (RDT) and the Clean System Power (CSP) Tool. Separately, LSEs should determine how to characterize what impact successful AB 1373 procurement could have on their individual procurement needs through specific changes to their preferred conforming portfolio and contract planning strategy in the Narrative Template. This document does not provide supplemental guidance for the Narrative Template.

**AB 1373 Resources Online Delivery Assumptions:**

The resource online delivery schedule includes several tranches of resources specified in the AB 1373 need determination with the corresponding procurement quantities. Staff used Table 2: *Recommended Approach and Indicative Timing for LLT Solicitations* adopted in D.24-08-064 to develop the delivery schedule in Table 1 below illustrating forecasted online status and procurement quantities for geothermal and LDES resources. In addition, contract start and end dates were included to populate necessary fields in the RDT for reliability. LSEs should use the information in this table to populate the relevant fields in the RDT and CSP tool for including AB 1373 geothermal and LDES resources in their portfolios.

**Table 1: LDES and Geothermal Deliveries and Contract Start/End Dates**

<b>Resource Type and quantity</b>	<b>COD</b>	<b>Contract Start Date</b>	<b>Contract End Date</b>
MDS LDES- 500 MW	June 1, 2032	June 1, 2032	June 1, 2041
12+ hr. LDES- 500 MW	June 1, 2034	June 1, 2034	June 1, 2033
Geothermal- 500 MW	June 1, 2032	June 1, 2032	June 1, 2041
MDS LDES- 500 MW	June 1, 2033	June 1, 2033	June 1, 2042
12+ hr. LDES- 500 MW	June 1, 2035	June 1, 2035	June 1, 2044
Geothermal- 500MW	June 1, 2035	June 1, 2035	June 1, 2044

Table 2 in D.24-08-064 also provided a solicitation and delivery schedule for offshore wind (OSW) that is now probably overly optimistic because of the significant headwinds that this resource is encountering. Staff used a different approach to develop forecasted online timing for OSW by using the core portfolio adopted in the 2026-27 TPP decision, D.26-02-057. In that decision, 4.5 GW of OSW was forced into RESOLVE to maintain a viable pathway to transmission development necessary to support the deployment of OSW in Morro Bay and northern California. This approach would maintain consistency with the 2023 PSP portfolio that adopted 4.5 GW of OSW and acknowledge that the June 1, 2037 online dates for OSW projected in D.24-08-064 are not feasible by extending the resource availability timeline in Morro Bay from 2032 to 2036 and for northern California from 2036 to 2041. Since the D.24-08-064 need determination for OSW is 7.6 GW, the deliveries of the residual 3 GW, all of which would likely be built in northern California, would be consistent with the resource availability timeline specified in the 2026-27 TPP. Table 2 below illustrates the forecasted online delivery timing, procured quantities, and contract start/ end dates associated with OSW that LSEs should use to characterize this resource in the RDT and CSP Tool. Contract start/ end dates are necessary to include in the RDT for resources that will contribute to reliability, however, to maintain consistency with other LSE contracts, the contract start and end dates should be entered for all resources.

**Table 2: Offshore Wind Deliveries and Contract Start/End Dates**

Resource Type and quantity	COD	Contract Start Date	Contract End Date
OSW- 1.5 GW- Morro Bay	June 1, 2036	June 1, 2036	June 1, 2045
OSW- 1.4 GW- Morro Bay	June 1, 2038	June 1, 2038	June 1, 2047
OSW- 1.6 GW- Humboldt	June 1, 2041	June 1, 2041	June 1, 2050
OSW- 1 GW- Humboldt	June 1, 2042	June 1, 2042	June 1, 2051
OSW- 1 GW- Humboldt	June 1, 2043	June 1, 2043	June 1, 2052
OSW- 1 GW- Humboldt	June 1, 2044	June 1, 2044	June 1, 2053

**Guidance for Including AB 1373 resources in RDT and CSP Tool:**

Including AB 1373 resources in the RDT and CSP Tool follows the same procedure used for any other generic planned resource, with the exception that the online deliveries and procured quantities are derived from the schedules provided by CPUC staff in Table 1 and 2 above. The following sections describe the process for characterizing AB 1373 resources in the RDT and CSP Tool. For complete RDT and CSP Tool instructions refer to the RDT User Guide and CSP Documentation that can be found at this link: [2024-2026 IRP Cycle Events and Materials](#)

**AB 1373 Resource Reliability Contributions in IRPs:**

Characterizing AB 1373 capacity resources for reliability contributions is completed in the RDT. Specific fields must be populated in the RDT for any resource to have ELCC values automatically calculated based on the marginal ELCC percentages for each resource type that were modeled using the least-cost portfolios completed for the 2024-26 IRP filing requirements.

When entering AB 1373 resource types in the RDT, use the specific online delivery dates, resource quantities, and contract start/ end dates provided above in Tables 1. The fields that must be populated to characterize AB 1373 resources for reliability contributions are described below:

- In Column B (resource) of the unique\_contracts tab enter one of the generic resource types selected from the resource tab in the RDT. For AB 1373 capacity resources the following resource types apply:
  - 12+ hour and multi day storage LDES resource types would be selected as either “Generic\_LDES\_12hr”, “Generic\_LDES\_24hr”, or “Generic\_LDES\_100 hr.”
- Enter the resource capacity from Table 1 for LDES resources
  - total nameplate capacity for the resource in column I (total\_nameplate\_capacity)
  - total contracted nameplate capacity in column J (contracted\_nameplate\_capacity)

- Enter the COD date for the resource in column AJ (COD\_year), column AK (COD\_month), and column AL (COD\_day)
- Enter the Start Date and End Date for all LDES capacity resources
  - Contract Start Date: column AM (contract\_start\_date\_year), column AO (contract\_start\_date\_month), and column AO (contract\_start\_date\_day)
  - Contract End Date: column AP (contract\_end\_date\_year), column AQ (contract\_end\_date\_month), and column AR (contract\_end\_date\_day)
- All AB 1373 LDES resources will likely be a standalone storage contract. ELCC type is based on the storage duration (12-, 24-, or 100-hour duration LDES.) Storage duration is calculated automatically using the values entered in column J (contracted\_nameplate\_capacity) and column V (contracted\_storage\_depth\_mwh)
  - Enter the total resource storage depth for the resource in column U (total\_storage\_depth\_mwh)
    - found in Table 1 above
  - Enter the LSEs allocation of contracted storage depth in column V (contracted\_storage\_depth\_mwh).
    - This would be calculated by using the value from Table 1 and the individual LSE allocation for that resource provided with the filing requirements. The individual allocation assumes full procurement (i.e., for 12+ hour LDES-1,000MW; for MDS LDES- 1,000 MW).
    - Example: If the tranche specifies 500 MW and the LSEs allocation was 10MW, the LSEs allocation for this resource would be 5 MW
- For LDES standalone projects enter “NotHybrid” in column M (is\_hybrid\_paired)
- In column BR (buying\_energy\_capacity) of the unique contracts tab only resources that have “EnergyCapacity” and “CapacityOnly” selected will be considered capacity contracts, and have ELCC values calculated

### **AB 1373 Resource Estimates for GHG emissions in IRPs:**

Characterizing estimated GHG emissions for LSE 2024-26 IRP portfolios require that all online, in-development and planned resources are entered into the CSP tool to estimate how much dispatchable system thermal generation is necessary to meet load above and beyond the LSEs contracted resources and meet its emissions targets. Including AB 1373 resources to estimate GHG emissions for their portfolios would follow the same steps as any other generic planned resource the LSE is including in their portfolio. Before resources can be entered into the CSP tool, they must first be entered into the RDT as a generic planned resource. Several fields must be populated in the unique\_contracts\_tab of the RDT before the results are uploaded into the CSP tool. AB 1373 resources will be uploaded to the CSP tool with all other online, in

development, review, and planned resources entered in the unique\_contracts\_tab. LSEs should use the process outlined below to incorporate AB 1373 resources into the CSP tool.

### **Steps for the RDT:**

- Enter the resource in Column B (resource) of the unique\_contracts\_tab corresponding to one of the following resource categories for AB 1373 resources
  - 12+ hour and multi day storage LDES resource types would be selected as either Generic\_LDES\_12hr, Generic\_LDES\_24hr, or Generic\_LDES\_100 hr.
  - Offshore wind would be selected as one of the two generic OSW resource types (NEW\_GENERIC\_WIND\_OFFSHORE\_NORTH, \_NEW\_GENERIC\_WIND\_OFFSHORE\_SOUTH)
  - Geothermal resources would be selected from one of the two generic geothermal resources (\_NEW\_GENERIC\_GEOTHERMAL, \_NEW\_GENERIC\_GEOTHERMAL\_ENHANCED).
- Using the hypothetical online dates and procurement quantities provided in Table 1 and 2 populate the following columns in the unique contracts tab:
  - Column I (total\_nameplate\_capacity)
  - Column J (contracted\_nameplate\_capacity)
  - Column AJ (COD\_year)
  - Column AK (COD\_month) and
  - Column AL (COD\_day)
- Enter the Start Date and End Date for all LDES capacity resources
  - Contract Start Date: column AM (contract\_start\_date\_year), column AO (contract\_start\_date\_month), and column AP (contract\_start\_date\_day)
  - Contract End Date: column AQ (contract\_end\_date\_year), column AR (contract\_end\_date\_month), and column AS (contract\_end\_date\_day)
- The selected generic resources must also be considered when populating additional columns for the CSP tool that are associated with it:
  - Column BV (csp\_resource\_category) is used to select the CSP resource category. For AB 1373 resources, the following three categories apply:
    - OSW selected as RPS Resource Custom Profile (GWh)
    - Geothermal selected as GHG-free non-RPS Resource Custom Profile (GWh)
    - 12+hr and MDS LDES selected as Storage Resource Custom Profile (MW)
- Depending on the specified COD the csp resource category would be associated with one of the csp study years

- Column BW (csp\_annual\_2028); Column BX (csp\_annual\_2030); Column BY (csp\_annual\_2035); Column BZ (csp\_annual\_2040); and Column CA (csp\_annual\_2045)

### **Steps for the CSP Tool:**

- Upload the entire CSPReportSheet tab in the RDT portfolio into the CSP Tool by pasting it into the Supply Inputs tab. This will include all online + in-development + review + planned resources.
- Because the hypothetical generic resources selected for AB 1373 do not have a generation load profile associated with them, the user must input custom hourly profiles into the Custom Hourly Profiles table in the Supply Inputs tab.
  - There are three separate custom resource profile tabs. Only one custom resource profile is allowed for each csp year. If multiple resources are represented for either category, the resources must be disaggregated outside of the tool and added together to produce one load shape representing each hour in the 8760 profile.
  - For AB 1373 eligible resources, only two of the three available custom resource profiles should be selected from.
    - RPS Resource Custom Profile for OSW and geothermal
      - Any AB 1373 OSW and geothermal procurement load shapes would be added with the load shape of any other planned resources in this category with online dates that match those for the csp year (2028, 2030, 2035, 2040, 2045)
    - Storage Resource Custom Profile for 12+hr and multi day storage LDES
      - Any AB 1373 storage procurement load shapes would be added with the load shape of any other planned resources in this category with online dates that match those for the csp year (2028, 2030, 2035, 2040, 2045)
  - The custom load profiles would be input into the User-Specified Profile rows of the portfolios selected by the LSE and be calculated along with the entire LSE portfolio.