

Integrated Resource Planning (D.21-06-035, D.23-02-040 and D25-09-007)

2025 IRP-MTR Compliance Filing

IRP Staff Response to Frequently Asked Questions

IRP staff hosted RDT Office Hours on Friday, November 14, 2025, with approximately 70 participants representing about 40 CPUC-jurisdictional Load Serving Entities (LSEs). Staff received a range of questions related to the materials released on November 12, 2025 (RDT v3_5_3 and the User Guide), as well as broader questions on how to accurately represent contracted resources for the upcoming December 2, 2025, IRP-MTR filings.

IRP staff have compiled these questions and are providing general guidance on the most frequently raised topics. In addition, several LSEs reached out individually with more detailed questions specific to their filings. Staff have responded to these inquiries promptly and encourage LSEs to review both the general guidance and the individualized responses as they prepare their December 2 submissions.

While the responses provided in this document address several general questions, it should be read in conjunction with the relevant CPUC MTR and STMR decisions, filing materials, and previous FAQ responses issued by IRP staff. All of these materials are available on the IRP Procurement Track website.

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What is the due date?

The due date is 12/2. Due to the Thanksgiving holiday, staff is providing an additional day for filings. However, LSEs may submit RDTs on 12/1/25 if preferred.

Should we include the MMT target in the file name? If so, which target?

Yes. Please use the 38 MMT target. Correct file naming is important when submitting the RDT. Ensure the file name follows the required naming convention.

The mtr_nqc_validation_tool sheet uses the ELCC for BESS based on the duration provided in unique_contracts when calculating DCR NQC but should it be using a 5hr BESS ELCC since DCR requires a conversion from the original BESS duration to 5 hr. For example, an LSE uses a 4-hr BESS project for DCR capacity, that nameplate gets derated to 5-hr BESS, but then 4-hr ELCC is applied to the derated nameplate - but should a 5-hr BESS ELCC be applied?

Staff first converts a standard battery with less than a 5-hour duration—such as a 4-hour battery—into its 5-hour equivalent when it is being claimed for DCR. After this conversion, the appropriate ELCC values are applied. For non-standard batteries, the ELCC is linearly extrapolated.

Have the office hours for the IIRP filing requirements been scheduled? When are informal comments on filing requirements due?

The date for IIRP filings has not yet been finalized. Once the filing requirements are released, staff will provide stakeholders with advance notice of the office hours.

Per the December 2, 2025, IRP Procurement Compliance Filing & Data Request document released on 11/12/2025, it is stated that "Additionally for purposes of keeping CPUC's project status information up-to-date, LSEs that are not required to make a D.21-06-035 or D.23- 02-040 compliance filing may still be required to submit a completed Resource Data Template Version 3 (RDTv3) due to the following request: LSEs should include any projects planned, in review, or in development as of 5/1/2024, or online after 11/1/2023, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order." Since BVES is not listed as obligated LSEs in D.21-06-035 or D.23-03-40:

1.1) We would like to confirm that they are still obligated to file an updated RDT with the unique contracts tab filled out, excluding the columns listed in the compliance filing overview.

Yes. LSEs not required to file under D.21-06-035 or D.23-02-040 may still be required to submit a completed RDTv3.

1.2) We would like to confirm that BVES is not required to fill out the NQC Validation Tool and the MTR NQC Summary sheets in the RDT.

LSEs are not required to complete the NQC Validation Tool, but they must submit a completed RDT with contract information.

2) Based on the above language, we would like to confirm that BVES must still include contracts in the unique contracts tab that have recently expired.

No. Expired contracts do not need to be included. This also applies to bridge contracts. LSEs may continue to report bridge contracts only if they are still active.

The resource_mix column is not for hybrid contracts based on instructions we've had for years. That column is for unspecified imports and suppliers' choice contracts.

Entries in the resource_mix column are required for all contracts.

If we are no longer showing bridges, should we input resources in their original COD tranche even if COD is after the cutoff date?

Staff have already addressed this in Responses **2a** and **2b** of the FAQ released after the May 2025 office hours. Please refer to the FAQ here:

https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/rdt-inquiries-and-responses_20250507.pdf

If the error-checking macro fails to run, will the RDT still be accepted?

Staff encourage LSEs to use the updated RDT that will be released shortly after office hours, as it resolves macro issues. However, if this is not feasible, the RDT will still be accepted.

When using a portion of a 4-hour battery resource for DCR compliance... what values should be listed in the Unique Contracts tab?

A separate September RA value can be identified based on the guidance in the RDT User Guide.

Due to D.25-09-007, do bridge contracts still need to be reported?

Expired bridge contracts do not need to be reported. Active bridge contracts may continue to be reported.

What do the years in the geothermal ELCCs represent in the validation tool (column F)?

They represent the contract execution date.

How should LLT contracts be entered into?

Staff conduct a thorough review of all submitted RDTs. It is preferable to enter LLT contracts on two rows, as it provides clearer information. However, entering them on a single row is also acceptable.

What ELCC should be used for delayed contracts or substitute contracts?

As noted in FAQ Version 5_1, delayed resources (short-term or long-term) may continue to count toward the tranche originally intended, and the corresponding ELCC methodology for that tranche/year may be applied.

Should all MTR tranches be reported, even if staff communicated that the tranche obligation was already met?

Yes. LSEs are encouraged to report all tranches. Staff rely on contractual data to perform several analyses that inform various Commission decisions.

Is there a ruling or email confirming the filing extension from December 1 to December 2?

Yes. The Filing Requirement overview documents and email announcements list December 2nd as the filing date.

For any bridge capacity secured for 2025, should it be entered for the entire tranche or only through September 18, 2025 (SCE PFM effective date)?

Please include the bridge capacity for the entire duration.

Do bridges need to be included in the crosswalk table? Any difference for unspecified vs. specified imports? Supporting docs required?

Expired bridge contracts do not need to be reported. Ongoing bridge contracts may be reported in the crosswalk table. No difference between unspecified and specified imports for this purpose.

Are new contracts entered into since the last RDT filing required for the 12/2 filing?

Yes. Provide contracts as soon as you have them. You do not need to wait for milestone completion. Include them in the crosswalk table if previously reported; if new, include them in both the supporting information tab and the RDT.

Question on dcr_5_hr_battery_size double-derating

The dcr_5_hr_battery_size column in the validation tool converts the DCR nameplate to a 5-hour equivalent only for verifying whether the resource meets the minimum nameplate requirement (5 MW) in D.23-02-040. It does not double-derate the values entered in unique_contracts.