

Integrated Resource Planning Filing Requirements Overview For IRP-MTR Procurement Compliance Filing

For Resource Data Template v20261015

California Public Utilities Commission

Energy Division

Last Updated: October 2026



**California Public
Utilities Commission**

Table of Contents

Table of Contents	2
Figures and Tables	3
Purpose	4
Background.....	4
IRP Procurement Order Data Request	4
Summer Reliability Data Request.....	5
IRP Planning Data Request.....	5
Filing Materials and Webpage	6
RDT User Guide	6
General Filing Guidance.....	6
Resource Data Template (RDT)	7
Supplemental Materials.....	9
Specific Filing Requirements	10
Crosswalk Table of Contents.....	10
Milestone Documentation.....	11
Milestone 1	11
Milestone 2	12
Milestone 3	12
Remediation Plan.....	12
Additional RDT Guidance and Notes	13
Instructions by Resource Procurement Category.....	14
Zero-Emissions Generation, Generation Paired with Storage, Demand Response	14
Long Lead-Time (LLT) Resources	16
Alternative Compliance Mechanisms	17
Delayed D.19-11-016 Resources	18
Emergency/Summer Reliability Resources	18
Additional Project Progress Tracking Request(s)	18
LA Basin Local Capacity Area.....	18
Submission Instructions.....	19
Submission Date	19
How to Submit	19
Naming Convention.....	19
Informal Filing	19

Formal Filing.....20

Support21

Figures and Tables

Table 1 – Required and Non-Required RDT Worksheets for This Filing..... 7

Table 2 – Example Crosswalk Table of Supplemental Filing Materials from LSE.....11

Table 3 – Paired Resources Table16

Purpose

Integrated Resource Planning (IRP) Staff provide this Filing Requirements Overview document to assist load-serving entities (LSEs) in preparing their **semi-annual IRP Mid-Term Reliability (MTR) Compliance Filing** for submission. This document outlines the information that LSEs must submit to enable IRP Staff to assess each LSE's compliance status with the Commission's MTR Decisions (D.) 21-06-035, D.23-02-040, D.25-09-007, and D.26-02-057.

In this document, users will find an overview of the data request associated with the procurement orders issued in the decisions, as well as instructions on how to prepare and file their filing materials, i.e., the Resource Data Template (RDT) and supporting documents, with the California Public Utilities Commission ("CPUC" or "Commission"). This document also intends to provide guidance for some filing requirements associated with D.21-06-035, D.23-02-040, D.25-09-007, and related decisions. However, this document is not intended to cover all requirements. LSEs have an obligation to review this document in concert with all relevant decisions, Staff's responses to Frequently Asked Questions (FAQs), and any other relevant Commission materials.

Background

IRP Procurement Order Data Request

In accordance with D.21-06-035 Ordering Paragraph (OP) 3¹:

"All load-serving entities named in Table 6 of this order, plus the individual electric service providers who will receive their individual allocations confidentially from Commission staff, shall procure the September net qualifying capacity [NQC] amounts given in Table 6, and shall file and serve on the service list of this proceeding or any successor proceeding compliance filings according to the schedule given in Table 7 of this order."

And D.23-02-040 OP 5²:

"Beginning after the August 1, 2023, procurement information compliance filings, all load serving entities subject to our integrated resource planning oversight shall continue making procurement data filings on December 1 and June 1 of each year to be assessed for compliance unless and until the Commission sets different requirements. The need for backstop procurement as discussed in Decisions 20-12-044 and 21-06-035 shall continue to be evaluated each year after receipt and

¹ <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M389/K603/389603637.PDF>

² <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M502/K956/502956567.PDF>

Filing Materials and Webpage

LSEs will provide the requested data and information in the issued Resource Data Template (RDT). The RDT is posted on the CPUC's [IRP Procurement Track Compliance Filing Materials](#) webpage^{5,6}, along with supplemental materials like this overview document, RDT User Guide, FAQs, and video recordings. LSEs should use the latest version of the RDT and related materials posted to the filing materials webpage (generally listed at the top). However, older FAQ documents may still be applicable for more recent compliance filings.

Additional filing materials from the LSE (e.g., crosswalk table, milestone documentation, engineering assessments, narratives) to be included with the RDT in the LSE's submission are described in later sections.

RDT User Guide

The RDT User Guide is a technical guide that describes in detail the various worksheets (tabs) and worksheet columns to be filled by the LSE. The latest version of the RDT User Guide can be found on the [IRP Procurement Track Compliance Filing Materials](#) webpage.

General Filing Guidance

Each LSE should fully and accurately complete the RDT in a way that adheres to the compliance requirements explained in this document and the RDT User Guide⁷. LSEs should include resource, project, and contract information in all applicable columns in the RDT. Information on these resources should be filed in the same RDT.

Any instructions included in the latest Filing Requirements Overview, RDT User Guide, and RDT supersede previous instructions and should be followed, as some previous Staff instructions and FAQ responses may no longer be applicable or relevant. If LSEs are unsure about any compliance filing guidance, they are encouraged to submit their questions to Staff at IRPDataRequest@cpuc.ca.gov.

The following constitutes general instructions to follow for **IRP-MTR procurement**

[cycle-events-and-materials/updated-filing-requirements-overview-document.pdf](#)

⁵ IRP Procurement Track Compliance Filing Materials: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/more-information-on-authorizing-procurement/irp-procurement-track/irp-procurement-filing-materials>

⁶ The general IRP Procurement Track webpage can be found here: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/more-information-on-authorizing-procurement/irp-procurement-track>

⁷ See IRP Procurement Track Compliance Filing Materials webpage for the latest RDT User Guide.

compliance filings required by D.21-06-035, D.23-02-040, and related decisions.

- A. All LSEs that have fulfilled their D.19-11-016 compliance obligations by December 1, 2024 with fully online projects no longer need to report on D.19-11-016 compliance as of June 2025.
- B. All LSEs who fall within the Commission's authority for the IRP proceeding and were given a procurement obligation for D.21-06-035, D.23-02-040, and similar decisions are required to file procurement data and supplemental documentation pursuant to the requirements set forth in D.21-06-035, D.23-02-040, and similar decisions. Please see more detailed instructions in [Specific Filing Requirements](#).
- C. Staff note that [Resolution E-5426](#)⁸ establishes the IRP Filing Citation Program (IRP FCP) and authorizes Commission Staff to fine LSEs for non-compliance with any mandatory filing deadlines and reporting requirements in IRP Proceedings, such as those in the Procurement and Planning Tracks. E-5426 replaces the citation program that was established by [Resolution E-5080](#)⁹.
- D. LSEs should include any projects that are planned, in review, or in development as of December 1, 2025, or online after November 1, 2023, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order. Please see instructions in [LA Basin Local Capacity Area](#).
- E. For the purposes of determining contract status for the submitted projects, use the submission filing deadline as the cutoff date. For example, if the LSE is filing for the June 2026 deadline, the cutoff date is June 1, 2026. See Table 2 on the [IRP Procurement Track](#) webpage for a list of submission deadlines.
- F. D.21-06-035 requires Diablo Canyon to be replaced with at least 2,500 MW from zero-emitting (ZE) generation, generation paired with storage, or demand response (DR) resources by 2025. This filing also requires LSEs to be compliant with their Diablo Canyon Replacement (DCR) procurement requirement.

Resource Data Template (RDT)

Table 1 – Required and Non-Required RDT Worksheets for This Filing

Required	Not Required
Worksheets:	Worksheets:

⁸ IRP Filing Citation Program:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M586/K499/586499718.PDF>

⁹ IRP Citation Program:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M344/K806/344806352.PDF>

Required	Not Required
• unique_contracts • mtr_nqc_validation_tool • mtr_nqc_summary	• Calcs • Reliability- Planning • Reliability RCPMP-Option I • Reliability RCPMP-Option II • CSPReportSheet Columns in "unique_contract" worksheet: • csp_resource_category • csp_annual_2028 • csp_annual_2030 • csp_annual_2035 • csp_annual_2040 • csp_annual_2045

G. LSEs should review the RDT User Guide for details in filling out the "unique_contracts", "mtr_nqc_validation_tool", and "mtr_nqc_summary" worksheets in the RDT.

- Comprehensive error checking will be conducted after submissions are received, based on the rules and relationships outlined in the RDT User Guide using the RDT Error Checking, Aggregation and Reallocation Tool (RECART). LSEs should expect RDT revision requests based on the RECART-generated error report within two weeks of their submissions.
- Staff developed an error checking macro as part of the RDT. Running the macro is required, and if an LSE does not run the macro, their submission may not be accepted. LSEs are required to correct any errors identified by the macro where possible, but an error-free report sheet may not be possible under certain conditions. LSEs should inform staff when making their filings if any errors cannot be corrected.
- Please note that staff previously instructed LSEs to create multiple lines in the unique contracts sheet in the data template if a project met multiple tranches. This is no longer necessary due to the drop-down list for the tranche column containing all possible combinations. Please only include one line for each project in the unique contracts tab. If the contract has an NQC value that changes from year to year, please include additional information in a note. When something fundamental about the contract changes (e.g., the resource's nameplate is expanded), please enter them as separate contracts (in separate rows). For more details, please review the RDT User Guide. For the NQC validation tool, LSEs should follow the guidance that instructs LSEs to have separate rows for each instance

where a single contract is being used for a distinct MTR “tranche.”

H. LSEs do not need to fill out the following for the procurement compliance filing:

- a. In the “unique_contract” worksheet, columns labeled:
 - “csp_resource_category”
 - “csp_annual_2028”
 - “csp_annual_2030”
 - “csp_annual_2035”
 - “csp_annual_2040”
 - “csp_annual_2045”
- b. Worksheets:
 - “Calcs”
 - “Reliability- Planning”
 - “Reliability RCPPP-Option I”
 - “Reliability RCPPP-Option II”
 - “CSPReportSheet”

Supplemental Materials

- I. LSEs should provide compliance filing documents (e.g., milestone documentation) with each filing as soon as they are available, even if it is for a future compliance deadline. For example, for their June 2026 submission, if an LSE has a contract with Project ABC to fulfill Tranche 6 (2028) and evidence of a notice-to-proceed (NTP), the LSE should submit the contract and NTP documentation with their June 2026 submission.
 - a. Providing the documents before a compliance deadline allows Staff to review documentation in advance and notify LSEs of potential issues that need to be resolved.
- J. LSEs are not required to resubmit supplemental documentation already provided to the CPUC in a previous compliance report, unless those materials have been amended or modified. If any supplemental documentation has been amended or modified (e.g., an amended contract), LSEs must include the amended/modified document in their filing submission.
- K. Please keep all folder and file names short and succinct to prevent path name length errors when unzipping compressed files.

Specific Filing Requirements

Per OP 1 in D.20-12-044, all LSEs with procurement obligations in D.19-11-016 who did not opt out of providing capacity for customers must submit compliance filings for backstop procurement on February 1 and August 1 of 2021, 2022, and 2023, in a format developed and disseminated by the CPUC for the publicly-available portion and containing information about progress towards achieving the electric capacity procurement requirements for 2021, 2022, and 2023. This same backstop process was adopted in D.21-06-035, D.23-02-040, and D.26-02-057. LSEs should follow all applicable instructions here for reporting their D.21-06-035, D.23-02-040, and similar decision resources.

Crosswalk Table of Contents

LSEs must include a table of contents ("crosswalk table") cover page with their submission (as shown below) that includes the following:

- Document name (e.g., "contractA_projectABC.pdf")
- LSE Unique Contract ID (e.g., "contractA_ABC")
- Milestone requirement that the document meets (e.g., Site Control, Online Status)
- Applicable tranche(s) (e.g., "D.21-06-035, Tranche 2")
- Compliance filing date (e.g., "6/1/2025")
- Location of document in filing (e.g., "June 2025 Filing, Appendix 4")

LSEs submitting a remediation plan and/or bridge contracts should include those documents in their crosswalk table as well.

The crosswalk table must include the location of all past MTR project milestones and other documentation submitted in prior filings. This enables reviewers to more easily locate past milestone documentation since LSEs are not required to resubmit materials that have not been amended or modified (see [Supplemental Materials](#)). Staff recommend appending new rows to a central crosswalk table document for easier recordkeeping.

Below is a crosswalk table template that LSEs may use for their cover page. The LSE Unique Contract ID column must match what is specified in the RDT. Please submit all supplemental documentation in a searchable format. LSEs may provide supporting documents in separate folders by project. Please keep the document and folder names short and succinct to prevent file path length issues.

Table 2 – Example Crosswalk Table of Supplemental Filing Materials from LSE

Document Name	LSE Unique Contract ID	Milestone Requirement Met and/or NP Contract Validation	Decision & Tranche(s)	Compliance Filing Date	Location
LSE_developer_ABCstorage_PPA.pdf	ABCstorage	Milestone 1 – Signed Contract Contracted Nameplate Capacity, pg. 5	D.21-06-035, Tranche 2 (2023)	August 1, 2023	Aug 2023 Filing > Zip Folder > PDF name: "ABCStorage_PPA"
LSE_developer_DEFstorage_NTP.pdf	DEFstorage	Milestone 2 – NTP	D.21-06-035, Tranche DCR Category	December 1, 2023	Dec 2023 Filing > Zip Folder > PDF name: "ABCStorage_NTP", page 4

Milestone Documentation

Pursuant to D.20-12-044, OP 2¹⁰, LSEs must submit supplemental materials that demonstrate project progress called "Milestone Documentation". The three Milestone items are described in more detail below. Regardless of project development status, LSEs are required to provide documentation and/or evidence for all three Milestones.

For all supplemental materials included in an LSE's submission, please keep folder and file names short and succinct to prevent long path name issues.

Milestone 1

For compliance with Milestone 1, LSEs must provide:

- **Executed contracts** for contracted resources
 - Executed contracts should state the nameplate value of the resource. LSEs should include the page number(s) in the crosswalk table (column "Milestone Requirement Met and/or NP Contract Validation") where the LSE's contracted nameplate capacity is located in the document. See the above table for an example.

¹⁰ <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M356/K271/356271811.PDF>

- If nameplate values are not included in the contract, LSEs may submit a signed attestation that includes the contracted nameplate value of the resource.
- Executed contracts should also include a project timeline. LSEs should note if the project timeline is located in other documentation.
- **Signed interconnection agreements**
- **Evidence of site control** with signed land leases or title deeds (either accepted)

Milestone 2

For compliance with Milestone 2, LSEs must provide a "Notice to Proceed" or similar contractual evidence of construction commencement. Additionally, LSEs meeting part of their obligation with imports, demand response, and/or sale of excess generation must submit executed contracts for these resources.

- **Notice To Proceed:** If the LSE does not have the "Notice to Proceed" documentation, they may submit evidence that serves a similar purpose, e.g., updates on construction milestones.
- **Imports:** Imports may not constitute more than 20% of an LSE's total obligation for D.19-11-016.
- **Demand Response:** LSEs procuring demand response (DR) resources must provide load impact protocols when available. If applicable, the LSE should also submit progress on Rule 21 permits for DR contracts involving BTM storage. LSEs must provide NQC via Load Impact Protocols, contracted NQC, or an estimated NQC. LSEs should be sure to indicate via the "NQC_reporting_source" column ("unique_contracts" tab) if the provided NQC is an estimate.

Milestone 3

For compliance with Milestone 3, LSEs must provide evidence of online status and commercial operation. Please provide a copy of the commercial operation date (COD) notice received. If such a copy is not available, such as in the case of an existing resource, LSEs should provide information as to where to find the resource in the CAISO Master Generating Capability list.

Remediation Plan

As of the latest revision date of this document, all milestones should be met for all D.19-11-016 procurement and for the 2023, 2024, and 2025 requirements of D.21-06-035.

In the event that an LSE is notified of a delay or contract failure, please include a remediation plan that describes the source of the delay, possible remediation actions

that will be taken by the LSE, whether the LSE has notified the CPUC previously of the delay, and what substitute resources the LSE may be able to procure. LSEs are also encouraged to include notes for each contract in the “notes” column of the “unique_contracts” worksheet in the RDT.

Additional RDT Guidance and Notes

- Projects pursuant to multiple orders should include a note indicating how much capacity the LSE intends to apply toward each order.
- LSEs must also fill out the NQC Validation Tool sheet for D.21-06-035 and D.23-02-040 resources. No other resources should be reported in this worksheet. Please see the RDT User Guide for instructions on how to fill out this tab. New columns have been added to this workbook to collect the NQC of resources pursuant to D.23-02-040.
- The NQC Validation Tool has been further modified to capture zero-emissions generation, generation paired with storage, or demand response requirement, a.k.a. “Diablo Canyon Replacement” (DCR) resources. Please see the RDT User Guide for instructions on how to enter these resources. These resources are now required to be entered into the NQC Validation Tool. Additionally, D.21-06-035 requires Diablo Canyon be replaced with at least 2,500 MW from zero-emitting generation, generation paired with storage, or demand response resources by 2025. Long-Lead Time (LLT) Procurement NQC should be reported in the column pertaining to its applicable tranche ELCC. Please indicate this resource is meeting your LLT requirements by selecting “firm_ZE” or “long_duration_energy_storage” in the “d2106035_procurement_cat” column. Please note that this is a change from some previous RDT versions.
- Please note that the “d2106035_procurement_cat” column option “ZE_gen_paired_dr” refers to the zero-emissions generation, generation paired with storage, or demand response, a.k.a. “Diablo Canyon Replacement” (DCR) requirement. The “ZE_gen_paired_dr” option should not be used for any resources that are not pursuant to that requirement. If an LSE is showing a zero-emission resource being used toward their general requirement, they can select general, and they should not select “ZE_gen_paired_dr” unless it is intended to specifically count towards the “zero emissions generation, generation paired with storage, or demand response” requirement.

Instructions by Resource Procurement Category

Zero-Emissions Generation, Generation Paired with Storage, Demand Response

Per D.21-06-035 OP 6, LSEs are collectively required to procure 2,500 MW of zero emissions generation, generation paired with storage, or demand response resources that meet certain requirements by 2025. OP 6 states:

“This zero-emitting capacity shall have the following characteristics: (a) Be from a generation resource, a generation resource paired with storage (physically or contractually), or a demand response resource; (b) Be available every day from 5 p.m. to 10 p.m. (the beginning of hour ending 1800 through the end of hour ending 2200), Pacific Time, at a minimum; and (c) Be able to deliver at least 5 megawatt-hours of energy during each of these daily periods for every megawatt of incremental capacity claimed.”

Engineering Assessment

LSEs must attach an engineering assessment to their supplemental documentation to address the above requirements. Staff will not provide nor require a precise format for these assessments but instead outline the minimum qualifications of these assessments. Staff reserve the right to request additional information from LSEs if insufficient detail is provided in the attached assessment(s). These assessments and additional documentation, if required, as well as the paired resources table in **Table 3**, must be submitted via one filing prior to the required online date for this procurement category. As this procurement category is required online by June 2, 2025, these materials should be provided as soon as they are available.

It is understandable that different portions of an LSE's portfolio for this procurement category will have different online dates and can be used toward an LSE's annual requirements prior to the ability to show an engineering assessment for a paired resource. However, procurement will not count toward the zero-emissions generation, generation paired with storage, or demand response requirement until the LSE is able to show the required engineering assessment and demonstrate how the resources will be paired.

Engineering assessments must meet the annual P50 standard set in FAQ 1.3.13¹¹ which states:

“Staff expects that the resource (or combination of paired generation and storage resources) should have on an annual basis, at least 50% probability of being “able to

¹¹ https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan/d2106035_faqv6_1_20250617.pdf

deliver at least 5 MWh during each of these daily periods for every MW of incremental capacity claimed”¹². If the probability is lower than 50%, then the resource does not comply with the decision and is ineligible. Staff expresses this standard as: the resource's annual P50 during the 5-hour period from 5 p.m. to 10 p.m. Pacific Time must be at least 1,825 MWh (5 x 365) for every MW of incremental net qualifying capacity claimed by the LSE to meet this procurement requirement.”

Engineering assessments should be in accordance with standard industry practice, per FAQ 1.3.13 (see footnote **11**), which states:

“Staff expects that the assessment should use standard practices in renewables and storage project financing (for example, taking into account battery charging restrictions, round trip losses, and with the probabilistic assessment considering standard sources of uncertainty including interannual resource variability). Staff expects that the only atypical aspect of this is the daily 5-hour window focus of this category of the procurement order.”

The engineering assessment must clearly state how the storage resource will be paired with the generating resource, if using paired resources. If only a portion of one or both resources is being used toward this requirement, that must be specified as well. Additionally,

- The LSE should include the location of the engineering assessment in the table of contents (“crosswalk table”) cover page.
- The LSE may provide additional information if it is necessary for Staff to assess compliance with OP 6 and all of D.21-06-035 for their resource or paired resources.
- If an energy-only resource is being paired with a storage resource, the LSE must meet the P50 assessment *within the CAISO footprint*. This is Staff's expectation of how an LSE would need to manage the use of a resource that is not deliverable in this situation. The LSE would need to show via the engineering assessment that sufficient energy will be provided specifically in CAISO to charge the battery prior to 5 PM for 5 hours of discharge. An energy-only solar project's capacity would not count directly at all towards the LSE's procurement requirement, since FAQ 1.1.2 (see footnote **11**) states resources must be deliverable.
 - Staff note that even if the solar project was deliverable, it follows from the P50 standard set in FAQ 1.3.13 (see footnote **11**) that is highly unlikely to contribute materially to reliability between 5 PM and 10 PM Pacific Time other than by charging the storage earlier in the day.

¹² D.21-06-035, OP 6.

Thus, it is likely that just the ELCC¹³ of the storage portion would be eligible towards an LSE's procurement requirement for this category anyway).

LSEs are encouraged to review all requirements in D.21-06-035 and D.23-02-040, as well as Staff's responses to FAQ (particularly FAQ 1.3.13, see footnote **11**) to ensure they are complying with all requirements.

Paired Resources Table

To streamline review of compliance with these requirements, LSEs should complete the following table for each paired resource being shown towards their required procurement for this category. The engineering assessment(s) should be the source of truth for item D.

Table 3 – Paired Resources Table

ABC Solar + Storage – Paired Resources Table

Item	Value	Source Documents (including relevant page numbers)
A. Generator nameplate capacity (MW)		
B. Storage nameplate capacity (MW)		
C. Storage duration (MWh)		
D. Annual P50 of combined resource during the 5-hour period from 5 p.m. to 10 p.m. Pacific Time (MWh)		
E. Reliability capacity being shown for counting towards the LSE's required procurement for this category (NQC MW)		
F. Eligibility test: Is D / E >= 1,825? (Yes/No) (If No, then the paired resource is ineligible)		Not applicable

Long Lead-Time (LLT) Resources

Pursuant to D.21-06-035 and D.23-02-040, LSEs are required to procure a total of 2,000 MW NQC of long lead-time (LLT) resources by June 1, 2028. The LLT resource procurement requirement is further broken down into 1,000 MW NQC of long duration energy storage (LDES) and 1,000 MW firm zero-emission (Firm ZE) resources.

Long Duration Energy Storage (LDES)

Contracts for long duration energy storage (LDES) must note that the storage resource is able to discharge for at least eight (8) hours at full nameplate value, per D.21-06-035,

¹³ ELCC = Effective Load Carrying Capability

OP 2a. Hybrid or paired resources can be used for this requirement as long as the storage portion of resource meets the above requirement per FAQ 1.3.1 (see footnote **11**). Additionally, per FAQ 1.3.1, if a hybrid resource is used, an engineering assessment must be submitted that demonstrates compliance with this requirement. The LSE should include the page number that an assessment of the resource's discharge capabilities can be found in the table of contents (crosswalk table) cover page. An engineering assessment is not required if the resource is not hybrid.

Firm Zero-Emission (Firm ZE)

Resources meeting the 1,000 MW NQC firm zero-emission (firm ZE) requirement must have an 80% capacity factor, per D.21-06-035, OP 2b. This will be based on forecasted capacity factors developed from the latest available design. LSEs should provide an engineering assessment to demonstrate that their resource meets the capacity factor requirement. Per instruction in [Supplemental Materials](#), LSEs must resubmit materials that have been modified and/or amended. LSEs should resubmit this assessment if substantive changes were made to the resource design that lower the capacity factor below the requirements for firm zero-emission resource procurement. The LSE should include the page number that an assessment of the resource's capacity factor can be found in the table of contents (crosswalk table) cover page.

Alternative Compliance Mechanisms

Bridge Resources

Please be sure to review D.21-06-035, D.22-02-004, D.23-02-040, and Staff's responses to FAQs for all requirements regarding bridge resources. Bridge resources should be explained and described in the LSE's remediation plan document. Bridge resources must also follow all the same requirements as other MTR-compliant resources, including instructions for data entry into the RDT and backstop / milestone documentation submission.

Staff recommend LSEs review the D.25-09-007, adopted on September 18, 2025, which modified the option for LSEs to use "bridge contracts" as an alternative compliance mechanism for specific mid-term reliability procurement requirements (discussed in next section). Starting on September 18, 2025, bridge resources are no longer available as an alternative compliance mechanism for procurement compliance.

Month-Ahead Resource Adequacy (MA RA)

Per OP 11 of D.25-09-007, "During any assessment of LSEs' compliance with the procurement requirements in D.21-06-035 and D.23-02-040, as modified by D.24-02-047, an LSE will be deemed in compliance with those procurement requirements if: (1) the LSE has sufficient executed long-term contracts (active contracts that meet the applicable requirements of D.21-06-035, D.23-02-040, and/or D.24-02-047, including the

required length of ten years or more) to meet the applicable procurement requirements; and (2) the LSE has met their month-ahead system resource adequacy requirements for each month the procurement is delayed by the final deadline for curing any resource adequacy deficiency. LSEs may be deemed compliant by using this compliance pathway for a period of not more than three years from the required online date of the applicable procurement requirement. This pathway applies to all procurement categories in D.21-06-035, D.23-02-040, and D.24-02-047."

Delayed D.19-11-016 Resources

If an LSE submitted a resource for D.19-11-016 that was put in the baseline for D.21-06-035 and that resource has not yet come online, the LSE may follow the instructions provided in the "Instructions and Template for LSEs Substituting Delayed Excess D.19-11-016 Procurement Capacity for D.21-06-035 Mid-Term Reliability (MTR) Procurement" document to count their resource toward D.21-06-035 instead. This requires that: (1) the resource will come online during the D.21-06-035 compliance period, and (2) the LSE has met their D.19-11-016 obligations with other resources. All requirements put forth in the referenced documentation must be met before or at the time of the filing. Additional information is also provided in FAQs.

Emergency/Summer Reliability Resources

In some circumstances, IOUs have submitted advice letters and received approval for resource procurement to meet summer reliability requirements. If the IOU seeks to change the use of the resource that it now will be used to meet some of their MTR obligations, Staff expect the IOU may need to make a filing identifying the change in the designation of the resource from being a summer reliability resource to being an MTR resource, and the resulting change in CAM (cost allocation mechanism) treatment.

Additional Project Progress Tracking Request(s)

For the purpose of keeping the Commission's project status information up-to-date, LSEs are also required to provide information on the following project type(s):

LA Basin Local Capacity Area

LSEs should include any projects with contract statuses planned, development, or review as of December 1, 2025, as well as any projects that came online after November 1, 2023 in the LA Basin local capacity area, even if not pursuant to either IRP procurement order.

- LSEs should complete the "sub-area" column in the "unique_contracts" worksheet in the RDT.

- LSEs should complete all applicable columns in the RDT for these projects.
- LSEs should not include any supplemental documentation for these projects, unless they are used to fulfill a procurement order.

Submission Instructions

Submission Date

Each LSE must submit a completed RDT along with supporting materials to the CPUC by 5 PM Pacific Time on the relevant filing submission deadline. Deadlines are posted to the [IRP Procurement Track](#)¹⁴ webpage.

How to Submit

Naming Convention

Staff note that it is important for LSEs to use the standard naming convention when saving the RDT file. The RDT file name must contain the 5 elements below, in the order provided. Use an underscore to separate each element. All letters should be in lower case.

1. The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse_names" tab
2. "rdt"
3. "38mmt"
4. Confidential vs. Public, written as "confidential" or "public"
5. Version number, written as the letter "v", followed by a number starting at 1. If you must resubmit an RDT file for any reason, increase this number by 1.

Examples

- "lse_a_rdt_38mmt_confidential_v3.xlsm" – LSE A's confidential RDT, 3rd revision
- "lse_b_rdt_38mmt_public_v1.xlsm" – LSE B's public RDT, 1st revision

Informal Filing

Please submit all materials to IRPDataRequest@cpuc.ca.gov via the CPUC FTP website (Kiteworks).

Filers who do not already have a CPUC secure FTP account should follow the

¹⁴ IRP Procurement Track webpage: <https://www.cpsc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/more-information-on-authorizing-procurement/irp-procurement-track>

instructions in the [secure FTP guide](#)¹⁵. From within the FTP application, users can send secure emails to CPUC Staff with large attachments. This mechanism allows filers to transmit a complete filing to CPUC Staff, including any portions deemed confidential (as described below).

Formal Filing

Parties should also read carefully and follow Rule 1.5 through 1.14 of the [Commission's Rules of Practice and Procedure](#)¹⁶ when preparing and submitting their filings.. This guidance is not intended to modify, in any way, the requirements set forth in the Commission's Rules of Practice and Procedure, which are considered authoritative.

E-Filing

- When making the formal filing, LSEs are encouraged to utilize the Commission's electronic e-filing system and select the document type "Compliance Filing".
- When e-filed, documents must be PDF/A compliant (see Rule 1.13).
- All materials should be e-filed, including PDF/A compliant versions of public spreadsheet materials, EIA forms, etc.
- Filers should include the verification required by Rule 1.11.
- Filers should also include a certificate of service (service requirements are discussed further below).
- If a document is larger than 50 pages or 3.5 megabytes, the filer should instead file and serve a "Notice of Availability" with a link to the materials housed on its own website in a publicly accessible format (see Rule 1.9(d)).
- Materials must be e-filed by 5 PM Pacific Time on the compliance filing due date.

Confidential Materials

LSEs may consider some contractual information confidential and wish to file accordingly. In such cases, LSEs need to submit two versions of their RDTs (confidential and public).

Along with the confidential and public versions of its materials, the LSE will need to separately file a "Motion to File Under Seal" with justification for keeping its material confidential, following the guidance in the Commission's decision D.06-06-066 for these purposes (see Rule 11.4; there is also detailed guidance contained in the [Commission's](#)

¹⁵ CPUC FTP Guide: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/kiteworksftpeexternalusersquickstartguide.pdf

¹⁶ CPUC Rules of Practice and Procedure: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K618/209618807.PDF>

[Practitioner Page](#) website¹⁷, "Filing Confidential Documents Under Seal").

The confidential version of the LSE's materials may be submitted under seal in hard copy form, or if the material exceeds 3.5 megabytes, may be submitted on an archival DVD directly to the Docket Office. For more detailed guidance on this issue, see the [Practitioner's Page](#) and look for "Mixed Media Filings: Cutting Edge Filing Techniques to Accommodate Multiple & Voluminous Media Formats".

LSEs should also ensure that confidential materials are delivered to Commission staff electronically immediately, regardless of the formal filing status, so that Staff can begin analysis.

Service of Materials

- All public versions of filed materials should be served to all members of the "service list" of the appropriate proceeding (See Rule 1.13).
- A proceeding's service list can be downloaded from its docket card or from the Commission's service list webpage by clicking on "Download comma-delimited file."
- Email service is generally preferred, but has some limitations:
- Some email servers will not accept or deliver messages to groups of more than 100 addresses. Thus, serving the whole service list may require dividing up distribution into smaller groups of recipients.
- Document size is also limited if serving by email, and thus a notice of availability with a public website link is preferred for large documents and underlying materials. Such an approach will also make spreadsheet materials more accessible and useful.
- Service should be performed on the same day as the filing deadline, by 5 PM Pacific Time.

If you have specific technical questions about this general formal filing guidance, you may contact the Commission's Docket Office at efile-help@cpuc.ca.gov or call (415) 703-2121.

Support

If LSEs are unsure about any compliance filing guidance, they are encouraged to submit their questions to Staff at IRPDataRequest@cpuc.ca.gov. If users feel that this Filing Requirements Overview, RDT User Guide, and other guidance materials can be improved, please send suggestions and/or recommendations to IRPDataRequest@cpuc.ca.gov.

¹⁷ CPUC Practitioner's Page: <https://www.cpus.ca.gov/about-cpus/divisions/administrative-law-judge/practitioners-page>