

Renewables Portfolio Standard (RPS) Webinar on 2025 RPS Procurement Plan Filing Requirements and Templates

Energy Division, Climate Initiatives, Renewables, and Admin. Branch

Renewables Procurement Section

May 23, 2025



California Public
Utilities Commission

Webinar Info & Purpose

- All participants will be muted on entry to the webinar
- Participants will have an open forum to ask specific questions during the second part of the webinar
- Disclaimer: This webinar will be recorded and uploaded to the [RPS Procurement Plans](#) webpage
- Review RPS Plan refinements and answer questions related to the [2025 RPS Procurement Plan Ruling \(2025 RPS Plans ACR\)](#)
- Explain changes and answer questions about the 2025 RPS Procurement Plan templates (available for download from [RPS Database](#))
- Review and answer questions about new requirements for SB 1174 Data reporting

Agenda

Agenda Item	Timing
Welcome and Introduction	11:00 – 11:05 am
Refinements to RPS Plans & Templates	11:05 – 11:10 am
Refinements to the SB 1174 Data Reporting Template	11:10 – 11:25 am
Submission Instructions and Procedural Schedule	11:25 – 11:30 am
Retail Seller Q&A	11:30 – 11:50 am
Wrap Up	11:50 am

Refinements from the 2025 RPS Plans ACR

- ED Staff review of the previous RPS Procurement Plans format found that it was complicated, lengthy, and in some cases redundant
- Significant revisions to the required RPS Plans format:
 - Reorganization of some RPS Plan sections & subsections to better group related topics
 - *(i.e. RPS supplies & demand, portfolio optimization, risk analysis, RPS contracting, etc.)*
 - Revisions to individual reporting requirements throughout RPS Plan sections to CLARIFY what elements of information and data must be reported
 - *(generally, we did not introduce new reporting requirements, but clarified existing ones)*
 - Eliminated redundant RPS Plan subsections and reporting requirements
- Revisions will improve quality of RPS Plans while streamlining RPS Plans preparation & review

Refinements from the 2025 RPS Plans ACR (cont.)

Table 1 Summary of Requirements for 2025 RPS Plans				
		Large IOUs	SMJUs	ESPs and CCAs
I.	Summary of Major Changes to RPS Plan	X	X	X
II.	Executive Summary Key Issues	X	X	X
III.	Compliance with Recent Legislation and Impact of Regulatory Changes	X	X	X
IV.	Assessment of RPS Portfolio Supplies and	X	X	X
IV.A	Portfolio Supply and Demand	X	X	X
IV.A.1	Long-term Procurement	X	X	X
IV.B	Portfolio Diversity and Reliability	X	X	X
	IV.B.1 Forecasting for Increased Transportation Electrification	X	X	X
	IV.B.2 Curtailment Frequency, Cost, and Forecasting	X	-	X
	IV.C Portfolio Optimization	X	X	X
	IV.C.1 Conformance with the IRP Proceeding	X	X	X
	IV.C.2 Response to Local and Regional Policies	X	X	X
	IV.D Lessons Learned – Assessment of RPS Portfolio Supplies and Demand	X	X	X
V.	Project Development Status Update	X	X	X
VI.	Potential Compliance Delays	X	X	X

New/Standalone section

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Refinements from the 2025 RPS Plans ACR (cont.)

	Large IOUs	SMJUs	ESPs and CCAs
VII. Risk Assessment	X	X	X
VII.A Compliance Risk	X	X	X
VII.B Risk Modeling and Risk Factors	X	X	X
VII.C Lessons Learned – Risk Assessment	X	X	X
VIII. Renewable Net Short Calculations	X	X	X
IX. Minimum Margin of Procurement (MMoP)	X	X	X
IX.A MMoP Level	X	X	X
IX.A.1 MMoP Methodology and Inputs	X	X	X
IX.A.2 MMoP Scenarios	X	X	X
X. Bid Solicitation Protocol	X	X	X
X.A Bid Selection Protocols	X	X	X
X.B Solicitation Protocols for Renewables Sales	X	X	-
X.C Least-Cost Best-Fit (LCBF) Criteria	X	X	X
XI. Safety Considerations	X	X	X
XII. Consideration of Price Adjustments	X	X	X
XIII. Cost Quantification	X	X	X
XIV. Impact of Transmission and Interconnection	X	-	-
XV. Appendix A: Redlined Version of the Draft	X	X	X

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Refinements from the 2025 RPS Plans ACR (cont.)

- Section II – Executive Summary / Key Issues
 - Retail sellers should itemize their specific requests for which they seek Commission Authorization and reference the RPS Plans section where the request is further explained in more detail
- Section IV.B.1– on Forecasting for Increased Transportation Electrification (TE)
 - Retail sellers must include a table/chart showing annual load from TE as forecasted
 - The table/chart must also compare the retail seller's TE load results to the CEC IEPR TE demand forecast results
 - Retail sellers must clearly identify which vintage year CEC IEPR forecast they are referencing for their TE forecast
 - If the retail seller is not using the most up-to-date CEC IEPR, it must provide reasoning for its choice of vintage year for the IEPR forecast
- Section IV.C.1 – on Conformance with the IPR Proceeding
 - Retail sellers must describe how the information in their 2025 RPS Plans should align with information to be filed in the retail seller's next round of individual IRPs, due on November 1, 2025

Refinements from the 2025 RPS Plans ACR (cont.)

- Section VII – Risk Assessment
 - Eliminated discussion of System Reliability in Risk Assessment sections. System Reliability discussion now focused in Section IV.B Portfolio Diversity & Reliability
- Section X – Bid Solicitations Protocols
 - Retail sellers must:
 - Describe how their solicitation process determines whether renewable energy resources are located in a disadvantaged community (DAC)
 - Describe how their procurement decisions will give preference to resources in those communities
- Section XIV – Impact of Transmission and Interconnection Delays
 - *(described further in next slides)*

Changes to the RPS Plan Templates

- **General Rule:** Templates will cover all years of current or past Compliance Periods (CP) where procurement has not been verified by the California Energy Commission and RPS compliance determinations have not been made by the CPUC
 - CPs may be eliminated from templates after compliance determinations are made
- 1. Renewable Net Short Template: Removed years 2017-2020 Actual columns, and added a column for 2035 using 60% PQR past CP 6 and updated forecast years.
- 2. Cost Quantification Template: Updated reporting years (actual and forecast), and added “Linear Generator” as a technology type.
- 3. Project Development Status Update Template: Added “Linear Generator” as a technology type.
- 4. Transmission/Interconnection Delay Data Reporting Template: *(described further in next slides)*

Changes to the RPS Plan Templates

Template	Change Description	Excel File Tab:	Excel File Cells:
Renewable Net Short	Removed years 2017-2020	"RNS Calculations"	(Old template) Columns F-J
Renewable Net Short	Updated forecast years beginning in 2025	"RNS Calculations"	Row 4, Column K
Renewable Net Short	Added column for 2035 using 60% PQRs past CP 6	"RNS Calculations"	Column X
Cost Quantification	Updated reporting years to 2021 – 2023 (actual) and 2024 – 2034 (forecast)	1. "Tables 1 & 2 (Cost)" 2. "Tables 3 & 4 (Generation)"	1. C7:E7, C36:M36, C62:M62 2. C7:E7, C34:M34, C58:M58
Cost Quantification	Added "Linear Generator" as a Technology Type	1. "Tables 1 & 2 (Cost)" 2. "Tables 3 & 4 (Generation)"	1. Row 20, Row 56, Row 83 2. Row 26, Row 54, Row 79
Project Development Status Update	Added "Linear Generator" as a Technology Type	1. "Project Development Status" 2. "Data Dictionary"	1. Column D 2. Row 5
SB 1174 Data Reporting	New template to replace previous "TX and IX Delay Data Template"	New template	New template

SB 1174 Data Reporting Template

- SB 1174 requires that electrical corporations that own transmission facilities provide information detailing the impact that delays to transmission facilities and network system upgrades have had on renewable energy and energy storage resources with executed interconnection agreements.
- Both the “Transmission Delay Reporting” tab and “Generation Reporting” tab must be completed.

1. Transmission Delay Reporting

2. Generation Reporting

SB 1174 Data Reporting Template

- **Transmission Delay Reporting tab** – List each transmission project that is:
 - A CAISO-approved or utility self-approved transmission project, interconnection project, or network upgrade needed for generator interconnection.
 - “In development”, meaning the project has commenced, but is not yet in-service OR became operational between January 1, 2020 and March 31, 2025.
 - Delayed OR not delayed (i.e. do not consider delay when listing projects).

SB 1174 Data Reporting Template

- **Generation Reporting tab** – List every in development renewable energy and energy storage resource (with executed interconnection agreements) currently in CAISO, WDAT, or other interconnection queues.

SB 1174 Data Reporting Template

- **“Instructions” Tab:** Provides details on each field and instructions for completing the SB 1174 Data Reporting Template.

"1. Transmission Delay Reporting" TAB				
Section 1: TRANSMISSION PROJECT DETAILS				
Field #	Project Data Field	Input Format	Input Example	Input Description
1	Transmission Project Name	Text string.	Manzanita Substation	Project's name at the date of filing, including the name as approved by the Commission.
2	Transmission Project Unique ID #1	Text string.	78493	Unique identification (ID) code(s) assigned by the Commission (SDG&E = Project ID).
3	Transmission Project Unique ID #2	Text string.	432	Unique identification (ID) code(s) assigned by the Commission (Breakdown Structure, SDG&E = Project ID).
4	Transmission Project Unique ID #3	Text string.	92	Unique identification (ID) code(s) assigned by the Commission (Project Identification Number, SDG&E = Project ID).
5	Description	Text string.	Repairs the transmission line connecting 4th and Townsend to the East Northfork station which failed due to the 2019 San Clemente Hedge Fire.	Brief project summary, including the project's purpose, location, and status.
6	Status	Drop-down menu selection.	Construction (10%-25%)	See drop-down menu. Indicate the project's status.
7	Operational Date	Date, formatted YYYY-MM-DD; N/A if not yet operational.	2025-08-15	If "Operational" was chosen in the status dropdown, then this date should be the date the project is expected to be in service.
8	Latitude	Number (decimal), separated by " " for multiple locations; N/A if no geolocation.	20.234 19.983	Positive number indicates north latitude; negative number indicates south latitude.

SB 1174 Data Reporting Template

- **“Definitions” Tab:** Provides a list of acronyms used throughout the template and definitions for in-service date change reasons, which is a dropdown list in field 29 on the “Transmission Delay Reporting” tab.

Acronym List

Acronym	Definition
AFUDC	Allowance for Funds Used During Construction
AL	Advice Letter
CAISO	California Independent System Operator
CEQA	California Environmental Quality Act
CPUC	California Public Utilities Commission
CSLC	California State Lands Commission
EIR	Environmental Impact Report
EIS	Environmental Impact Statements
FERC	Federal Energy Regulatory Commission
GO	General Order

Date Change Reasons Defined

Reason	Definition
Bundling Dependencies	Another delayed project must be completed
Clearances	Non-permit related clearance delays from
Completed Early	Project completed before originally scheduled
Financing	Project delayed due to capital and financing
ISO Action	The CAISO de-prioritized or re-prioritized
Land Rights	The project required easements, exercise
Material	Issues with equipment or components that
Outage	Outages (planned or unplanned) that impact
Permitting (CPUC/CEQA)	Project delays related to CPUC permitting
Permitting (non-CPUC/CEQA)	Project delays related to federal, state, or

SB 1174 Data Reporting Template

- **“Changes” Tab:** Lists all the changes in the 2025 version of the template from the 2024 version.

Changes from the 2024 to 2025 SB 1174 Data Reporting Template

Tab	Change
All	General formatting changes.
All	General editing for clarity.
Instructions	Further defined what transmission projects must be reported within the 1174 SB data request.
Instructions	The date range for completed transmission projects that must be reported has been updated.
Instructions	Clarified that "Operational" projects' operational date should match the actual in-service date.
Instructions	Updated the Input Description for several fields.
Definitions	Added new acronyms to Acronym List.
Definitions	Updated definitions in the Date Change Reasons Defined table.
Transmission Delay Reporting	Added field for GIDAP Related.
Transmission Delay Reporting	Added field for Year Expected to be Considered in CAISO TPP.
Transmission Delay Reporting	Added field for Location.
Transmission Delay Reporting	Added fields for Latitude and Longitude.
Transmission Delay Reporting	Added fields for Transmission Project Unique ID #2 and #3.
Transmission Delay Reporting	Added field for CAISO Study Area.

- **“1. Transmission Delay Reporting” Tab:** List all transmission projects.

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SB 1174 Data Reporting Template

- “1. Transmission Delay Reporting” Tab: New section on Permitting.

NEW

Section 3: PERMITTING STATUS (CPUC/CEQA)				
30	31	32	33	34
CEQA Status	CEQA Status Date	CEQA Document Type	NEPA Document Type	CEQA Lead Agency

SB 1174 Data Reporting Template

- “1. Transmission Delay Reporting” Tab: Auto-populated fields and highlights.

NEW

Fields 25 and 26 below are automatically populated. No input needed.

Fields 27 and 28 below will highlight in light red if the project has been delayed. Please indicate choices other than N/A.

ON PROJECT VARIANCES					
24	25	26	27	28	29
Planned or Actual In-service Date	Original In-service Date Source	In-service Date Total Delay (Days)	Project is Delayed	Delay Resolver	In-service Date Change Reason
1/1/2026	1/1/2023	46023	Yes		
		0	No		
		0	No		
		0	No		

SB 1174 Data Reporting Template

- “1. Transmission Delay Reporting” Tab: New Delay Resolver field.

ON PROJECT VARIANCES					
24	25	26	27	28	29
Planned or Actual In-service Date	Original In-service Date Source	In-service Date Total Delay (Days)	Project is Delayed	Delay Resolver	In-service Date Change Reason
1/1/2026	1/1/2023	46023	Yes		Material
		0	No	Utility	
		0	No	Customer	
		0	No	Developer	
		0	No	CAISO	
		0	No	CPUC	
		0	No	Agency - Federal	
		0	No	Agency - Local	
		0	No	Agency - State	
		0	No	N/A	

SB 1174 Data Reporting Template

- **“2. Generation Reporting” Tab:** List every renewable energy and energy storage resource (with executed interconnection agreements) currently in CAISO, WDAT, or other interconnection queues.

Section 1: GENERATION RESOURCES DETAILS					
1	2	3	4	5	6
Generation Facility Name	In-Queue Number (CAISO or WDAT)	Generator Resource ID	Primary Developer	Developer Parent Company Name	Nameplate Capacity

SB 1174 Data Reporting Template

- **“Choices” Tab:** Source and reference for template’s dropdowns.

1. TRANSMISSION DELAY REPORTING			
6	11	12	15
Status	Caiso Study Area	GIDAP Related	Action Taken
Abandoned	PG&E: Humboldt Area	Yes	New
Canceled	PG&E: North Coast & North Bay Area	No	Relocate
Construction (10%-25%)	PG&E: North Valley Area		Removal
Construction (25%-50%)	PG&E: Central Valley Area		Replace
Construction (50%-75%)	PG&E: Greater Bay Area		Upgrade/Retrofit
Construction (over 75%)	PG&E: Greater Fresno Area		N/A
Construction (under 10%)	PG&E Kern Area		Multiple Options [See I

SB 1174 Data Narrative

- A narrative component regarding SB 1174 data is also required within RPS Procurement Plans and should correspond with the data in the template.
- See “6.14. RPS Plan Section XIV: Impact of Transmission and Interconnection Delays” of the ACR for complete narrative instructions.

SB 1174 Data Narrative

- The ACR's narrative instructions detail 7 specific narrative components to be included. Please review each of the 7 components and make sure to include them in your plans.
- Please note that all sections have been refined, so please read over each narrative section requirement closely.

SB 1174 Data Narrative

- Changes to #3:
 - The top five (5) delay reasons in terms of the total number of transmission projects that have been delayed.
 - The top five (5) delay reasons in terms of reliant GW of renewable energy and energy storage resources.
 - The top five (5) delay reasons in terms of longest median delay times (in months).

SB 1174 Data Narrative

- For #4, please include the actual, filled out, table in the RPS Plan.

Table 4: In-service Date Change Reasons for Delayed Transmission Projects

Delay Reason	Total Number of Generation Resources Impacted	Total Resources Impacted (GW)	Total RPS-Eligible Resources Impacted (GW)	Median Delay Time Per Project (months)
Bundling Dependencies				
Clearances				

SB 1174 Data Narrative

- Changes to #6:
 - Asks for narrative context if “Customer” was identified as the Delay resolver.
 - Asks for narrative context if “Permitting” was identified as the Delay Reason.

Submission of Info with Confidential Claims

- Underlying principle: information is to be publicly accessible to the greatest extent possible while allowing for protection of certain market-sensitive information
- [D. 21-11-029](#) modified the number of years that certain data may be kept confidential for RPS compliance and procurement reporting for all LSEs
 - Energy and capacity forecast data - **Front two years** of forecast data and the **current year/year of filing** data may be kept confidential
- Draft and Final RPS plans will be interpreted as being **filed in the same year** to preserve confidentiality of data for the current year and the first and second forecast years

Filing and Submission Instructions

For instructions or questions related to filing and serving RPS Procurement plans and templates:

- Refer to the 2025 RPS Plans ACR at <https://docs.cpuc.ca.gov/PublishedDocs/Efile> for filing instructions and requirements
- RPS templates (excel files) must be submitted through the RPS database at <https://rpsd.cpuc.ca.gov>
 - Retail sellers must register to login to the system and can download the templates there

If an LSE is requesting confidential treatment for any portion of its RPS Procurement Plan:

- Send Energy Division the confidential versions of the RPS Procurement Plan PDF document to rpscompliance@cpuc.ca.gov through the CPUC's secure File Transfer Protocol website - <https://kwftp.cpuc.ca.gov/>
 - (Reminder: Excel files for RPS templates must be submitted through RPS Database)

Procedural Schedule For 2025 RPS Procurement Plans

Process Details	Date
Assigned Commissioner's Ruling setting scope and schedule for annual RPS Plans	4/17/2025
PacifiCorp files 2025 On-Year Supplement	5/1/2025
IOUs, Small Utilities, ESPs & CCAs file draft annual RPS Plans	6/30/2025
Comments on RPS Plans	7/28/2025
Motions requesting evidentiary hearing	7/28/2025
Motions to update RPS Plans	8/11/2025
Reply Comments on RPS Plans	8/11/2025
Commission votes on Proposed Decision	Fourth Quarter 2025
IOUs, Small Utilities, ESPs & CCAs file final annual RPS Plans	30 days from the effective date of the Final Decision
IOUs issue Request for Offers for Solicitations or otherwise pursue approved RPS Plan	14 days after Final RPS Plan filings, unless extended by Energy Division

Retail Seller Q&A

- **Q&A Session Instructions**

- All participants are muted on entry into the webinar
- Use the Raise Hand function or send your question through the chat panel to the Host / All Participants

- **To use the Raise Hand Function**

- Find your name on the participant list, and hover over your name. A Raise Hand icon will appear. Click on the Raise Hand button, which will place a small hand icon next to your name in the participant list. Click on the Lower Hand button to withdraw the request.



- **To Send a Question through Chat**



- Click on the Chat icon at the bottom of the screen. The chat panel will appear in the bottom right corner. By default, when sending a message, it will go to all the participants. You can send messages to the host, panelists, or all participants by selecting the drop-down labeled: **Send to** and choosing between these options.

Example:



Additional Questions?

The RPS website can be accessed at
[Renewables Portfolio Standard \(RPS\) Program \(ca.gov\)](https://www.cpuc.ca.gov/renewables-portfolio-standard-rps-program)

Answers to frequently asked questions on RPS Procurement Plans are available on the [RPS Procurement Plans](#) webpage

For any remaining questions or comments please contact
rpscompliance@cpuc.ca.gov