

## **2025 RPS Procurement Plans Webinar – May 23, 2025**

### **Q&A Follow-up**

**Q:** The IOUs are supposed to use the Project Development Status Update (PDSU) template. However, the LSE dropdown menu does not list the IOUs. So, we cannot populate our name (SDG&E) in the document. We need to have that updated to include the IOUs.

**A:** These modifications are in progress and will be completed soon. We will notify the RPS service list once the modified RPS Plans templates are available for download in the RPS database.

**Q:** On TE (transportation electrification) forecasts, I'm not aware of the CEC having specific forecasts for ESPs or SMJUs.

**A:** Even if a retail seller is not using the California Energy Commission's (CEC) forecasts in their transportation electrification (TE) forecasting methodology because a specific CEC forecast is not available or not suitable for their situation, a comparison to the CEC's Integrated Energy Policy Report (IEPR) transportation electricity demand forecast is still required.

For RPS Plans, the Commission does not require retail sellers to use the CEC's forecasts as the basis for TE forecasting in their RPS Plans. Rather, Ordering Paragraph 3 of Decision 18-05-026 requires retail sellers to explain how retail sellers "considered" the CEC's IEPR transportation electricity demand forecast in creating their own forecast. Depending on the situation, retail sellers could "consider" the CEC's IEPR for TE forecasting in RPS planning in different ways. As a guide, here are some examples of how the IEPR could be considered or compared:

- Retail sellers who use the CEC's IEPR in their TE forecasting should describe how the IEPR is used in their TE forecasting methodology.
- If the CEC's IEPR is suitable for a retail seller's TE forecasting, but the retail seller prefers to use other forecasts because they are more optimal than the IEPR, the retail seller should explain why when describing its TE forecasting methodology. It should also provide a comparison of its TE forecast to the IEPR.
- For situations where a retail seller does not use the CEC's IEPR forecasts for its TE forecasting because it is not suitable, or is unavailable, or is otherwise inappropriate for their situation, the retail seller must explain why the IEPR forecast is inadequate and is not used for TE forecasting (in addition to providing a description of the data

and methodology used to support the retail seller's TE forecast). A comparison of its TE forecast to the IEPR (especially with charts/graphs) would be helpful in explaining why the IEPR is inadequate.

Please refer to the [17 April 2025 Ruling on the 2025 RPS Plans](#) for specific instructions on how retail sellers must report on their TE forecasts in their RPS Plans.

**Q:** SCE wanted to provide the below feedback regarding the Cost Quantification Table Template:

Tables 1 & 2 (Cost) tab

- Cell B1: "LSE Name" dropdown choices do not include SCE, SDG&E and PG&E
- Cell I89: Incorrectly references cell I32, should reference cell I62

Tables 3 & 4 (Generation) tab

- Cell B2: Should be in date format

In addition, throughout the 4 tables, it would be visually helpful to format cells (\$, ¢/kWh, thousands separator) where appropriate.

**A: These modifications are in progress and will be completed soon. We will notify the RPS service list once the modified RPS Plans templates are available for download in the RPS database.**

**Q:** Are RPS redline documents required to be submitted with the new updates in the narrative documentation? It makes for a very messy comparison.

**A: Yes, as per the [17 April 2025 Ruling on the 2025 RPS Plans](#), "each retail seller shall provide a "redlined" version of the 2025 RPS Plan to identify all changes from its Final 2024 RPS Plan to the Commission's Energy Division Staff to facilitate review of the draft 2025 RPS Plans. The redlined version must also be made available to any party who requests a copy."**

**Q:** What is the purpose of Variable K "RECs from Expiring RPS Contracts (MWh)" in the RNS Calculation template. This information is not used and does not affect any RNS calculation. Is it necessary?

**A: Yes, it is necessary for retail sellers to provide data for RECs from Expiring RPS Contracts because ED Staff uses this specific data to prepare the statutorily required “CPUC Annual Report to the Legislature on Costs and Cost Savings for the Renewables Portfolio Standard” (published annually in May). This data is required to conduct the analysis for the report and ED Staff collects the data through retail sellers’ RNS templates submitted as part of their RPS Plans.**

**Q: When should we expect a corrected Cost Quantification Template to be released?**

**A: These modifications are in progress and will be completed soon. We will notify the RPS service list once the modified RPS Plans templates are available for download in the RPS database.**

## **SB 1174**

**Q: Slide 12: Are transmission projects to be listed only if they haven't reached in-service or commercial operation through the end of 2025? Or should they be listed if they reached in-service or commercial operation anytime in the five-year period?**

**A: All transmission projects that are in development and haven't reached in-service must be reported. Additionally, completed transmission projects that have reached in-service any time between January 1, 2020 and March 31, 2025 must also be reported.**

**Q: Slide 14: For Field 14 on the Generation Reporting tab, what is considered an RPS eligible resource?**

**A: Pursuant to Section 399.13, the California Energy Commission (CEC) certifies eligible renewable energy resources. Generation from a resource that is not CEC-certified cannot be used to meet RPS requirements. For the purposes of this data request, please refer to the eligible renewable energy resources identified in Table 1 of the CEC’s RPS Guidebook. Resources utilizing the listed eligible renewable energy resources should be marked as RPS eligible. Please see page 40 and 41 of the RPS Guidebook when considering RPS eligibility of energy storage devices. A facility that has an energy storage device may count only the generation that is exported to the grid.**

Q: For each RPS eligible resource listed on the Generation Reporting tab, how do I calculate the “Expected Annual RPS Eligible Generation” in Field 7?

**A: For each RPS eligible resource listed, estimate its capacity generation (MWh) over the course of a year using the methods described in the CEC’s [RPS guidebook](#) “Measuring Renewable Generation” section (pg 29).**

Q: Slide 17: On the Generation Reporting tab, there is no field for actual in-service date – where should this be indicated?

**A: Resources listed on the Generation Reporting tab are expected to still be in development, as such there would be no actual in-service date. However, there is a field to indicate the “Planned In-service Date”.**

Q: Slide 21: How do I indicate that a transmission project is currently in development as opposed to it became operational between January 1, 2020 to March 31, 2025 on the Transmission Delay Reporting tab?

**A: If a transmission project became active between January 1, 2020 to March 31, 2025, mark it as “Operational” in the dropdown list for Field 6 “Status”. If the transmission project is still in development, please provide the most appropriate option in Field 6 “Status”.**

Q: Slide 25: Should section three (3) of the SB 1174 Data Narrative include both delayed transmission projects currently in development and transmission projects that have reached in-service, but were delayed prior to becoming operational?

**A: Yes. Both currently in development delayed transmission projects and projects that became active between January 1, 2020 to March 31, 2025, but were delayed prior to becoming operational must both be considered within your delay analysis.**

Q: How would a project in the CAISO queue have an executed interconnection agreement?

**A: We are interested in generation and storage resources that have an executed interconnection agreement but are not yet operational (have not achieved in-service). In the SB 1174 data template we consider these resources as “in the queue”.**

**Q:** Is the “Caiso Study Area” Field 11 in the Transmission Delay Reporting tab applicable only to the projects approved in CAISO 25-26 Transmission Planning Process?

**A:** "CAISO study area" is applicable to the 25-26 Transmission Planning Process or earlier. For transmission projects approved in older TPPs, select the best equivalent CAISO study area in Field 11.

**Q:** I do not see “Customer Action” as a reason for delay in the 2025 SB 1174 data template. Is this a change from the 2024 options?

**A:** Yes. CPUC staff removed "Customer Action" as an option for reason for delay. Instead, retail sellers need to use a combination of "Delay Resolver" (field 28) and "In-service Date Change Reason" (field 29) to describe why a customer delay occurred. For example, If a network upgrade is delayed because the customer is unable to acquire financing then "Delay Resolver" = "Customer" and "In-service Date Change Reason" = "Financing".

## RPS Database

**Q:** Who can I contact if I need assistance with the new [RPS Database](#)?

**A:** Please email [RPSD\\_Support@cpuc.ca.gov](mailto:RPSD_Support@cpuc.ca.gov) for assistance.

**Q:** I prepare and submit RPS Procurement Plans for more than one retail seller. Can I submit on behalf of each retail seller in the new [RPS Database](#)?

**A:** Yes. However, you will need to create an account with a unique username that is tied to a specific retail seller for each retail seller you will be submitting for. Additionally, if you will be attesting on the retail seller’s behalf, you will need to have either the “Attestor” or “Admin” role within the database. The Admin for the retail seller will assign you a role when approving your registration.

**Q:** Slide 29: Will Excel templates submitted through the [RPS Database](#) be kept confidential?

**A: Yes, for the draft 2025 RPS Procurement Plans, workbooks (Excel templates) submitted through the RPS Database will be treated as confidential.**

**Q:** In the RPS Database Portal, the SB1174 template is in the Files section and no file type is displayed (as opposed to being in the workbook section and showing as an Excel file). Can you confirm what the file type is for the SB 1174 template?

**A: When downloading the SB 1174 template from the [RPS Database](#), the file will be downloaded as an Excel file. The template needs to be uploaded within the files section as an Excel file.**