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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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R2401017

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.

Rulemaking 24-01-017

**ASSIGNED COMMISSIONER AND ASSIGNED ADMINISTRATIVE
LAW JUDGE'S RULING IDENTIFYING ISSUES AND SCHEDULE OF
REVIEW FOR 2026 RENEWABLES PORTFOLIO STANDARD
PROCUREMENT PLANS**

Summary

Pursuant to the authority provided in Public Utilities (Pub. Util.) Code §399.13(a)(1),¹ this Ruling identifies the 2026 Renewables Portfolio Standard (RPS) Procurement Plan filing requirements for all retail sellers of electricity and sets a schedule for the Commission's review of the 2026 RPS Procurement Plans (RPS Plans). Retail sellers should take careful note that this ruling has revised various RPS Plan requirements related to Integrated Resource Planning (IRP) reporting information to streamline the preparation and review of the plans and to reflect current IRP filing requirements. Other clarifications and small modifications were made to RPS Plan requirements to improve the overall

¹ Pub. Util. Code §399.13(a)(1) orders the Commission to "direct each electrical corporation to annually prepare a renewable energy procurement plan... to satisfy its obligations under the renewables portfolio standard" as well as "require each electrical corporation to review and update its renewable energy procurement plan... The commission shall require all other retail sellers to prepare and submit renewable energy procurement plans..." All subsequent code section references are to the Public Utilities Code unless otherwise indicated.

quality of RPS Plans and eliminate redundancies. As noted in the companion ruling to this one from 2025, the definition of “retail seller” in Pub. Util. Code §399.12(j) includes the electrical corporations, as defined in Pub. Util. Code §218, community choice aggregators (CCAs),² and electric service providers (ESPs).³

Senate Bill (SB) 100 (De León, Stats. 2018, ch. 312) (SB 100) increased the RPS to 60 percent by 2030 and established a goal for 100 percent of the State’s retail electricity to come from renewable and zero carbon resources by 2045. The RPS Plans shall demonstrate that each retail seller’s efforts align with the State’s RPS goals. Additionally, pursuant to Decision (D.) 17-06-026, new RPS compliance rules commenced in the 2021-2024 compliance period.⁴ Thus, the 2026 RPS Plan filings shall inform the Commission of the retail seller’s activities and plans to procure 65 percent of RPS resources from long-term contracts of 10 or more years for all compliance periods, including the current compliance period.

² Pub. Util. Code §399.12(j)(2) states that “A community choice aggregator shall participate in the renewables portfolio standard program subject to the same terms and conditions applicable to an electrical corporation.”

³ R.24-01-017, Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2025 Renewables Portfolio Standard Procurement Plans, April 17, 2025, at 1-2.

Pub. Util. Code §399.12(j)(3) states that “The electric service provider shall be subject to the same terms and conditions applicable to an electrical corporation pursuant to this article.”

⁴ D.17-11-037 modified D.17-06-26 to adopt an exclusion for PacifiCorp and Liberty Utilities, which do not operate in a California Balancing Authority (Non-CBA Utilities). Non-CBA utilities are authorized to follow the framework adopted in D.12-06-038 regarding excess procurement, regardless of their ability to procure portfolio content category 1 renewable energy credits. See e.g. D.17-11-037 at 3. [“...we will modify the Decision...and allow Non-CBA Utilities to be able to accumulate excess RECs.”]

For procedural efficiency, all 2026 RPS Plans shall follow the consistent numbering convention, as outlined in Table 1 of this Ruling. Additionally, at the time of filing, the 2026 RPS Plan shall be accompanied by an officer verified checklist using the uniform template specified in Attachment B.

The electrical corporations subject to this Ruling are the six investor-owned utilities (IOUs): Pacific Gas and Electric Company (PG&E), Southern California Electric Company (SCE), San Diego Gas & Electric Company (SDG&E), PacifiCorp, Bear Valley Electric Service, Inc., and Liberty Utilities (CalPeco) LLC. The ESPs subject to this Ruling are identified in Attachment C. All current CCAs and any CCA that intends to serve customers in 2026 and beyond are subject to this Ruling and are identified in Attachment D. CCAs that have submitted Implementation Plans to serve load after 2026 are also required to file a 2026 RPS Plan.

Although this Ruling mostly follows the format of past Rulings initiating the annual RPS procurement process, this ruling has revised various IRP reporting requirements and clarified other RPS Plan requirements. The purpose of these changes is to streamline the preparation and review of the plans, and improve the quality of RPS Plans. These revisions were made based on lessons learned from previous RPS Plan submissions and changes to current market and regulatory conditions.

Consistent with Pub. Util. Code §§399.13(a), 399.13(b) and 399.13(c) and the requirements in SB 350 (De León, Stats. 2015, ch. 547) (SB 350) and SB 100, which extend, increase, and modify RPS procurement rules, the Commission will

issue a decision on the proposed RPS Plans by the end of the year.⁵ For CCAs and ESPs, the Commission's decision will determine if the RPS Plans comply with this Ruling and the requirements of Pub. Util. Code §399.13.

1. General Requirements for 2026 RPS Plans

In D.12-11-016, the Commission refined the RPS procurement process as part of its implementation of SB 2 (1X) (Simitian, Stats. 2011, ch.1). In 2015, SB 350 increased the RPS procurement requirement and modified the RPS procurement rules. The Commission issued D.17-06-026 implementing SB 350's requirement that, beginning January 1, 2021, at least 65 percent of the procurement a retail seller counts toward the RPS requirement of each compliance period shall be from its contracts of 10 years or more in duration or ownership agreements for eligible renewable energy resources.⁶ Further, SB 100 accelerated California's RPS requirements to 60 percent retail sales from eligible renewable resources by 2030 and a planning goal of having 100 percent of the State's electricity served by zero carbon resources by 2045.

Consistent with statutory requirements and the Commission's decisions, the IOUs, CCAs, and ESPs shall comply with the requirements outlined in Section 5 of this Ruling. Small and multi-jurisdictional utilities (SMJUs) are subject to a subset of the requirements, as described in Sections 2 and 3 of this Ruling.

⁵ Pub. Util. Code §399.13(c) states that "The commission shall review and accept, modify, or reject each electrical corporation's renewable energy resource procurement plan prior to the commencement of renewable energy procurement pursuant to this article by an electrical corporation. The commission shall assess adherence to the approved renewable energy resource procurement plans in determining compliance with the obligations of this article."

⁶ D.17-06-026, Ordering Paragraph (OP) 2.

Attachment A sets the procedural schedule for the Commission's review of the 2026 RPS Plans. Updates to the filed 2026 RPS Plans may be provided consistent with the schedule in Attachment A. Table 1 is the template to be used for 2026 RPS Plans. All RPS Plans shall be filed using a completed checklist, as shown in Attachment B.

2. Multi-Jurisdictional Utilities with 60,000 or Fewer Customers (Subject to Pub. Util. Code §399.17)

RPS procurement requirements for SMJUs and their successors allow these utilities to meet their RPS procurement obligations without regard to portfolio content category limitations in Pub. Util. Code § 399.16.⁷

PacifiCorp is permitted to use an Integrated Resource Plan (IRP) prepared for regulatory agencies in other states to satisfy its annual California RPS Plan requirement so long as the IRP complies with the requirements specified in Pub. Util. Code § 399.17(d). PacifiCorp prepares its IRP on a biennial schedule, filing its plan with the Commission in odd-numbered years.

D.08-05-029 requires PacifiCorp to file and serve its IRP in Rulemaking (R.)06-05-027 or its successor proceeding at the same time it files with the jurisdiction requiring the IRP and to file a supplement with the Commission 30 days later. This on-year supplemental filing includes an analysis of how the IRP and on-year supplement comply with the requirements in Pub. Util. Code §399.17(d). Pursuant to D.11-04-030, in years that PacifiCorp does not file an IRP, it files a comprehensive RPS supplement to its IRP on July 15th. The comprehensive supplemental filing includes an analysis of how the IRP and

⁷ Pub. Util. Code § 399.17(b) defines PacifiCorp as a multi-jurisdictional utility for RPS purposes. Liberty Utilities (CalPeco) LLC is a successor entity under Pub. Util. Code §399.17 and not a multi-jurisdictional utility because it has customers only in California.

comprehensive supplement comply with the requirements in Pub. Util. Code §399.17. PacifiCorp filed its IRP on April 1, 2025; therefore, it will file its comprehensive RPS supplement in 2026. PacifiCorp's off-year comprehensive RPS supplement shall provide the aforementioned analysis and the information required in Sections 6.1-6.13 and 6.15 of this Ruling.

Liberty Utilities (CalPeco) LLC will prepare a 2026 RPS Plan subject to the same requirements as a small utility under Pub. Util. Code §399.17.

3. Small Investor-Owned Utilities with Fewer than 30,000 Customers (Subject to Pub. Util. Code §399.18)

Pub. Util. Code §399.18(b) addresses small IOUs with less than 30,000 customers and allows compliance with the RPS procurement obligations without regard to the portfolio content category limitations in Pub. Util. Code §399.16.

A small utility shall file an RPS Plan according to Pub. Util. Code §399.13(a)(6), tailored to account for its RPS procurement requirement and the limited resources of a small utility.

Bear Valley Electric Service (BVES) is the only small IOU with less than 30,000 customers. Accordingly, BVES shall include the information required in Sections 6.1-6.12 and 6.14-6.15 of this Ruling in its 2026 RPS Plan.

4. ESPs and CCAs

SB 350 modified the RPS Plan filing requirements for ESPs and CCAs to be consistent with Pub. Util. Code §399.13(a)(6).⁸ Accordingly, each ESP and CCA shall file a proposed RPS Plan that complies with all Sections of this Ruling.

⁸ See Pub. Util. Code §399.13(a).

The CCAs play an increasingly significant role in meeting state Greenhouse Gas (GHG) reduction goals. In 2024, CCAs and ESPs served approximately 36 percent of California’s retail load.⁹ Therefore, it is essential for planning purposes that the Commission is fully informed of all procurement across the State, including those carried out by CCAs and ESPs.

Consistent with D.19-02-007, Ordering Paragraph (OP) 2, this Ruling directs the CCAs and ESPs to include RPS information in their 2026 RPS Plans in response to Pub. Util. Code §399.13(a)(6)¹⁰ and previous Commission decisions.¹¹ Reporting this information will provide the Commission, the Legislature, and the public with a complete picture of the State’s RPS program to support electric reliability as the state heads toward 100 percent zero-carbon energy. For the State to fully understand the impact of procuring zero-carbon resources, CCAs and ESPs shall also include cost information in their RPS Plans, in the same manner as covered by the IOUs, and as described in Section 6.14.¹²

All new CCAs and ESPs shall file RPS Plans when they register with the Commission or 90 days before their commercial operation date, whichever is first.¹³ Accordingly, all new registering CCAs and ESPs should file their RPS Plans with the Commission at the time of registration and serve their RPS Plan to the RPS proceeding Service List (R.24-01-017).

⁹ Data is derived from retail sellers’ annual 2025 RPS Compliance Reports.

¹⁰ Pub. Util. Code §399.13(a)(6) requires information on renewable supply and demand, compliance delays, solicitations to procure renewable energy, project development status updates, price adjustment mechanisms, and project failure risk.

¹¹ RPS Decisions can be accessed at: www.cpuc.ca.gov/rps_decisions_proceedings

¹² And *see*, Pub. Util. Code §913.3 requiring the Commission to report “the costs of all electricity procurement contracts for eligible renewable resources”

¹³ D.17-12-007 at OP 4.

In D.13-11-024, the Commission gave guidance on the applicability of a motion for provisional waiver from filing future RPS Plans. For retail sellers that stop serving load, we want to streamline the process when they decertify or deregister during an RPS Plan filing cycle.¹⁴ The CCAs and ESPs, listed in Appendix C and D, shall file a motion for exemption from filing Final RPS Plans and future Plans in the proceeding if they intend to decertify or deregister at the Commission before the Commission issues a proposed decision. The exemption motion shall inform the Commission of the retail seller's future status. If the motion is granted, it does not exempt the CCA or ESP from the required filing of a Final RPS Compliance report for any compliance period that the decertified or deregistered CCA or ESP served load for which RPS compliance has not been determined.¹⁵ Proper notification in the RPS proceeding will allow the Commission to consider whether a Final RPS Plan is required or not and decide whether a CCA or ESP is subject to future RPS requirements and actions.

The Commission will reject RPS Plans from any retail sellers that do not provide adequate details on the required information.¹⁶ A retail seller that does not comply with RPS Plan requirements may be subject to fines pursuant to the citation program adopted by the Commission or existing statutory provisions.¹⁷

¹⁴ To "decertify" or "deregister" is when a retail seller is not registered with the Commission to serve retail load.

¹⁵ See D.24-04-009 for additional requirements for deregistering.

¹⁶ In D.19-12-042 (at OP 6 and OP 15) the Commission rejected several retail sellers' 2019 RPS Plans for insufficient or incomplete information.

¹⁷ See E-5143, Pub. Util. Code §§ 2101-2105, 2107, 2108 and 2114.

5. Specific Requirements for 2026 RPS Plans

The 2026 RPS Plans shall comply with the requirements set out in this section of the Ruling. Table 1 summarizes the RPS Plan sections that each retail seller shall comply with within its filing.

An officer shall verify the 2026 RPS Plan using the uniform template in Attachment B. The retail seller shall complete the checklist to confirm that all sections are correctly addressed. The checklist will ensure consistency and completeness at the time of filing.

The RPS Plan quantitative templates are available for download on the RPS Database system.¹⁸ Energy Division Staff will hold a webinar to discuss questions from retail sellers related to the templates and 2026 RPS Plans' requirements no later than three weeks before the due date to file Draft RPS Plans.

The RPS Plans shall include all information required by statute and as specified in this Ruling, including quantitative analysis supporting the retail seller's assessment of its portfolio and future procurement decisions. Narrative explanations should be provided to explain the quantitative analysis. Responses to Section 6.8 shall be provided in a numerical/quantitative format to support the written responses to Sections 6.4, 6.5, 6.7 and 6.9. The RPS Plans' information should be non-confidential, to the greatest extent possible, and well supported with underlying assumptions, references, and citations.

When filed with the Commission, each proposed 2026 RPS Plan shall achieve the following:

¹⁸ The RPS Database system can be accessed at: <https://rpsd.cpuc.ca.gov/>. Registration is required to login to the system.

1. To ensure compliance with Table 1, all RPS Plans must be accompanied by a Checklist provided in Attachment B.
2. All RPS Plans shall describe the overall plan for procuring RPS resources to satisfy the RPS program requirements while minimizing cost and maximizing value to customers, as well as demonstrating how retail sellers will comply with direction for RPS planning in SB 350, SB 100, and SB 901 (Dodd, Stats. 2018, ch. 626). This includes, but is not limited to, any plans for building retail seller-owned resources, investing in third-party owned renewable resources, and engaging in the sales of RPS eligible resources.
3. The various aspects of the RPS Plan shall be consistent. For instance, the bid solicitation protocol documents should be consistent with any statements and calculations regarding a retail seller's renewable net short position.¹⁹
4. The RPS Plans should thoroughly describe and address procurement and sales of RPS-eligible resources that demonstrate reliability and align with the State's policy goals. The RPS Plan format requires responses that provide both summaries and the detailed descriptions necessary to understand how a retail seller's planning and procurement strategies address state goals and satisfy statutory requirements. For the IOUs, the Commission may accept or reject proposed contracts based on consistency with the approved plan, including any calculation of RPS procurement net short position.²⁰
5. All retail sellers shall follow the format and numbering convention directed in Table 1. Uniform format and templates will enable parties, bidders, and the Commission to easily access, review and compare the

¹⁹ As of the date of this Ruling, the methodology can be found in *Administrative Law Judge's Ruling on Renewable Net Short*, May 21, 2014, issued in R.11-05-005.

See <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M091/K331/91331194.PDF>

²⁰ Pub. Util. Code §399.13 (d).

RPS Plans. All sections shall be numbered in the same way, without skipping any sections, for ease of Commission review.

Table 1			
Summary of Requirements for 2026 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
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 Mechanisms	X	X	X
XIII.	Cost Quantification	X	X	X
XIV.	Impact of Transmission and Interconnection	X	-	-
Appendix A: Redlined Version of the Draft		X	X	X

6. Draft RPS Plans

6.1. RPS Plan Section I: Summary of Major Changes to RPS Plan

Retail sellers shall provide a summary of major changes to their 2026 RPS Plans. Major changes refer to actual substantive changes between the 2025 and 2026 RPS Plans, including but not limited to new RPS -eligible procurement, updated risk mitigation strategies, and changes in Minimum Margin of Procurement (MMoP).²¹ Retail sellers shall summarize each significant change and explain the reason for the change, and shall not only provide the two plans with strike-out and underlined inserts.

If a new CCA did not submit an RPS Plan in 2025, it must include any differences between its previously certified CCA Implementation Plan and the proposed 2026 RPS Plan.

6.2. RPS Plan Section II: Executive Summary Key Issues

All filings shall include a high-level summary of the key issues discussed in the RPS Plans. Potential key issues could consist of but are not limited to service expansions, outcomes of solicitations for RPS resources, and contracts for

²¹ Retail sellers are not required to provide editorial summaries of the changes from 2025 to 2026. Instead, this table should identify the major substantive modifications that significantly differ in 2026 relative to the 2025 plans approved in D.25-12-025.

RPS resources executed within the last calendar year. Additionally, retail sellers should itemize their specific requests for which they are seeking Commission authorization and reference the section for the detailed explanation.

6.3. RPS Plan Section III: Compliance with Recent Legislation and Impact of Regulatory Changes

This section shall summarize how a retail seller’s proposed RPS Plan complies with relevant legislation, such as SB 350, SB 100, and SB 255 (Bradford, Stats. 2019, ch.407) (SB 255).²² Retail sellers should not write a general summary of the legislative requirements. Instead, each retail seller must specify how its planned renewable energy procurement comports with the State’s orders and guidelines and advances the retail seller’s compliance with legislative mandates.

6.4. RPS Plan Section IV: Assessment of RPS Portfolio Supplies and Demand – Pub. Util. Code §§399.13(a)(6)(A), 399.13(a)(6)(B), 399.13(b), 399.15(b)(5), Compliance with D.17-06-026 Implementing SB 350’s Requirement for Long-Term Procurement, Compliance with D.18-05-026 and D.14-11-042

Pub. Util. Code §399.13(a)(6)(A) provides that the renewable energy procurement plan shall include an assessment of annual or multi-year portfolio supplies and demand to determine the optimal mix of eligible renewable energy resources with deliverability characteristics that may consist of peaking, dispatchable, baseload, firm, and as-available capacity.

As a forward-looking document, the RPS Plan shall explain planning for current and future years, with significant focus and details for how 2026 procurement efforts will impact a retail seller’s long-term procurement requirements for current and upcoming compliance periods. The Commission

²² D.22-04-035 implemented SB 255 revising General Order 156 by adding Supplier Diversity Program requirements, including those pertaining to certain to CCAs.

will carefully review how retail sellers plan to meet the 65 percent procurement requirement to be derived from long-term contracts of 10 or more years in the 2026 RPS Plans, including any potential risks of failing to meet this requirement and a retail seller's plans to apply excess procurement in one compliance period to later compliance periods.²³

Accordingly, all retail sellers shall provide written assessments of their annual and multi-year portfolio supply and demand concerning RPS requirements, the RPS program, and the RPS program's overall goals in order to determine the retail seller's optimal mix of eligible renewable energy resources. This information shall be presented in the following subsections:

IV.A Portfolio Supply and Demand: At a minimum, retail sellers' written assessments of their RPS portfolio supply and demand must include the following elements:

1. The written assessment shall be completed for all years through 2036 and a near-term planning horizon that accounts for both portfolio supply and demand.
2. The written assessment shall include the retail seller's need for RPS resources with specific deliverability characteristics (*e.g.*, peaking, dispatchable, baseload, firm, and as-available capacity) and any additional factors, such as curtailment rights and operational flexibility, in order to determine the retail seller's optimal mix of eligible renewable energy resources.
3. Retail sellers shall also explain how the quantitative analysis provided for RPS Plan Section VIII: Renewable Net Short Calculations supports the assessment of portfolio supply and demand.
4. The written assessment shall describe how procurement, allocations, or sales planned for the period covered by the

²³ See D.17-06-026.

2026 RPS Plans is consistent with the evaluation of supply and demand. *Note: retail sellers who have not yet begun to serve load shall describe their planned procurement forecast for the 2026 procurement cycle. The information from retail sellers will help determine their preparedness to serve load in a manner that will reliably meet RPS goals.*

IV.A.1 Long-term Procurement: D.17-06-026 requires that 65 percent of each retail seller's procurement counted towards RPS requirements be from contracts (or ownership or ownership agreements) with term lengths of 10 years or more in duration. In addition, the Commission encourages early planning on long-term procurement to hedge against delays in project development for new renewable build and potential project performance issues.

Therefore, retail sellers are required to present a narrative description of how their current and planned RPS portfolios will comply with the long-term procurement rules. This narrative shall also include the following elements:

1. The assessment of how a retail seller's current and planned procurement meets the 65 percent long-term contracting requirement shall be completed for all years through 2036.
2. The narrative on long-term RPS procurement planning must include a quantitative assessment of retail sellers' long-term RPS procurement progress that is clear enough to gauge a retail seller's long-term RPS position. It shall include specific long-term procurement values in gigawatt-hours (GWh) for current and future compliance periods. Charts and graphs alone are insufficient as they lack the specificity the Commission needs to evaluate a retail seller's long-term position.
3. The assessment of current and planned long-term RPS procurement shall include a short description of the long-term contracts, resources, or portfolio mix that will be used to meet the long-term procurement requirement.
4. If a retail seller has not already executed enough contracts to meet the 65 percent long-term contracting requirement,

the assessment shall also include a detailed timeline for how the retail seller is planning to meet the long-term procurement requirement, including how the need will be met in future compliance periods. If the retail seller receives an SB 155²⁴ letter from the Commission's Energy Division, the retail seller shall include a timeline (pursuant to Pub. Util. Code §399.13(a)(4)) describing planned actions to meet the 65 percent long-term procurement requirement.

IV.B Portfolio Diversity and Reliability: Resource diversity can support reliability by ensuring that renewable procurement complements system needs. Therefore, retail sellers shall describe how their portfolio diversity supports system reliability and maximizes ratepayer value.

First, all retail sellers shall describe how portfolio diversity is considered, both qualitatively (*e.g.*, geography, technology, contract type, contract start/end dates, etc.) and quantitatively (*e.g.*, Least-Cost Best-Fit or Net Market Value valuations, IRP modeling, portfolio modeling, etc.), in their renewable procurement decisions and procurement processes.

Second, all retail sellers shall describe how planned RPS portfolio diversity would contribute to system reliability in a planning horizon through 2036. This written description shall explain the following:

1. How the proposed renewable energy portfolio incorporates overall energy portfolio and system requirements.
2. How the proposed renewable energy portfolio aligns with expected load curves and duration.

²⁴ SB 155 (Bradford, Stats. 2019, ch.401) (SB 155) requires the Commission to review annual preliminary RPS Compliance reports and to notify at-risk retail sellers that, based on the Commission's review of their compliance reports, they may not be in compliance with their RPS requirements in the current and/or future compliance periods. SB 155 also requires the Commission to provide recommendations for retail sellers on how they might satisfy the requirements.

3. How the portfolio mitigates any negative system impacts (e.g., rolling electric outages, violation of current standards for ancillary services, etc.).
4. How the portfolio addresses the issues of renewable integration and the underutilization of existing RPS-eligible generation.

Third, all retail sellers shall describe how planned portfolio diversity will maximize ratepayer value while minimizing costs and risk (e.g., project development risk, technology risk, etc.).

Fourth, retail sellers shall also provide an explanation of how energy storage resources and emerging technologies, such as offshore wind developments or other technologies, are addressed in their diversity and reliability planning. If retail sellers are not considering advanced emerging technologies, their diversity assessment should explain the reasons for their decision.

IV.B.1 Forecasting for Increased Transportation Electrification: Retail sellers must address local transportation electrification adoption trends while planning for portfolio diversity and renewable resource procurement to meet incremental RPS requirements, consistent with OP 3 of D.18-05-026.²⁵ Therefore, all retail sellers shall demonstrate that transportation electrification is quantitatively accounted for in their RPS procurement plans. When reporting their

²⁵ D.18-05-026 at OP 3 (“... all retail sellers ... must annually demonstrate that transportation electrification is accounted for in their procurement plans by explicitly referencing forecasted transportation electrification in their Renewables Portfolio Standard procurement plans; providing a detailed description of the data and method used to support their forecast; and explaining how they considered the California Energy Commission’s Integrated Energy Policy Report transportation electricity demand forecast in creating their own forecast”). See also D. 22-12-030 at 16-17.

transportation electrification forecasts, retail sellers shall provide the following information:

1. A detailed description of the data and methodology used to support the retail seller's transportation electrification forecast.
2. A comparison of the retail seller's transportation electrification forecast to the California Energy Commission's Integrated Energy Policy Report (IEPR) transportation electricity demand forecast. The retail seller shall clearly identify which vintage year IEPR forecast the retail seller is referencing for its transportation electrification forecast. If the retail seller is not using the most up-to-date IEPR forecast, it shall provide reasoning for its choice of vintage year for the IEPR forecast. Finally, if the retail seller is not using or considering the IEPR transportation electricity demand forecast in creating its own transportation electrification forecast, it shall provide its reasoning for its decision.
3. Retail sellers shall include a table and/or chart showing the annual load from transportation electrification as forecasted in their analysis. These graphics shall also compare the retail seller's transportation electrification load results to the IEPR transportation electricity demand forecast results.
4. Retail sellers that do not perform a transportation electrification forecast shall provide reasoning for their decision or their RPS Plan will be rejected.

The requirement to reference transportation electrification forecasts in RPS procurement plans also applies to ESPs whose customers' demand may increase,²⁶ even though the total direct access program is capped.

²⁶ D.19-05-043 at 13-15; D.10-03-022, Appendix 2 at 7 ("Changes in the 12-month usage of direct access (DA) accounts will be reflected in order to determine the room available under the cap.

IV.B.2 Curtailment Frequency, Cost, and Forecasting: In D.14-11-042, the Commission approved curtailment terms and conditions in pro forma contracts for PG&E, SCE, and SDG&E and directed reporting on curtailment frequency, forecasting, and costs. As retail sellers become more numerous and diverse, and as the State moves towards the electricity sector becoming 100 percent carbon-free, all retail sellers need to report their unique experiences and issues related to economic curtailment, as well as any actions and analysis needed to forecast curtailment events. The Commission recognizes the inherent challenge of long-term forecasting of negative pricing events. Retail sellers shall, however, provide strategies tailored to their portfolios and region to show how they are managing exposure to negative pricing events, overgeneration, and economic curtailment.

Given the increase in renewable development and curtailment on the system in recent years, retail sellers shall provide information in their 2026 RPS Plans on the following topics as they relate to their current and future RPS procurement:

1. Factors having the most impact on the projected increases in incidences of overgeneration and negative market price hours.
2. Written description of a quantitative analysis of the forecast of the number of hours per year of negative market pricing for the next 10 years.
3. Experience, to date, with managing exposure to negative market prices (or lessons learned from other retail sellers in California if a new retail seller).
4. Direct costs incurred, to date, for incidences of overgeneration and associated negative market prices.

No customer taking DA service while room was available under the cap will be removed from DA service as a result of growth in DA load.”)

5. Overall strategy for managing the overall cost impact of increasing incidences of overgeneration and negative market prices.
6. Contract terms included in RPS contracts intended to reduce the likelihood of curtailment or protect against negative prices.

Pursuant to Pub. Util. Code §399.13 (a)(6)(B) and §399.15(b)(5), retail sellers should not simply outline general issues related to curtailment but shall explain how they are actively addressing challenges related to curtailment events and include information on each of the issues detailed in 1-6 above.

IV.C Portfolio Optimization: All retail sellers shall describe how they are planning to optimize portfolios. Portfolio optimization descriptions should include policies, goals, strategies, solicitations, any Request for Information (RFI), and coordination efforts across Commission program requirements and retail sellers.²⁷ For 2026 RPS Plans the IOUs shall report on the status and outcomes of previous RFIs.

IV.C.1 Conformance with the IRP Proceeding: The IRP proceeding (R.25-06-019) is the primary venue for implementing the SB 100 requirements related to resource planning for the electric sector. While the Commission is still considering how to align the IRP process and RPS Plans, we still expect consistent information on RPS planning across the respective proceedings.

Under this section, all retail sellers shall explain in the revised table format below (Table 2) how the information in their 2026 RPS Plans, will align with information that is to be filed in their next round of individual IRPs, due on August 10, 2026, to ensure that their RPS obligations are in compliance (*e.g.*,

²⁷ *E.g.*, IRP requirements, rate affordability, compliance risks, retail seller mission statements, climate change, joint solicitations, etc.

renewable resource valuation and target setting).²⁸ This information should also conform with the determinations made in the IRP Proceeding, including the balanced and diverse set of resources identified in the most recent preferred system plan adopted by the Commission.²⁹ The revised 2026 RPS Tables must provide concise narratives for the respective proceedings (IRP and RPS) to allow a direct comparison that the Commission can easily follow and determine consistency with adopted IRP optimal portfolios and planning assumptions.

Table 2
Alignment of IRP and RPS Planning

IRP Section / Subsection (from IRP Narrative Template ³⁰)	RPS Alignment in IRPs
III. ³¹ Study Results A. Conforming and Alternative Portfolios B. Preferred Conforming Portfolio	Retail sellers should explain how the RPS resources they plan to procure, as outlined in their RPS Plan, will align with, or be used to implement, each of their Conforming

²⁸ See R.25-06-019 *Administrative Law Judge’s Ruling Setting Requirements for Individual Integrated Resource Plans due June 1, 2026*, dated January 16, 2026, directed retail sellers to file their individual IRPs on June 1, 2026. See also R.25-06-019, *Administrative Law Judge Julie A. Fitch issued a ruling dated March 9, 2026, which granted retail sellers an extension to file their individual IRPs no later than August 10, 2026.*

²⁹ See D.24-02-047, which adopts the 2023 Preferred System Plan portfolio for use in planning and procurement. D.24-02-047 also states that the 2023 Preferred System Plan will be used as the basis for the next round of individual IRPs.

³⁰ The required IRP Narrative Template required for individual IRP filings can be found at the CPUC’s 2024-2026 IRP website: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/long-term-procurement-planning/2024-26-irp-cycle-events-and-materials>. See also *Administrative Law Judge’s Ruling Setting Requirements for Individual Integrated Resource Plans due June 1, 2026*, dated January 16, 2026, for more info.

³¹ Roman numerals in Table 2 correspond to those in the IRP narrative template.

	<p>Portfolios³² being developed in their IRP Plans for Commission approval and certification. This explanation should include:</p> <ol style="list-style-type: none"> 1. Existing RPS resources that the retail seller owns or contracts. 2. Existing RPS resources that the retail seller plans to contract with in the future. 3. New RPS resources that the retail seller plans to invest in. 4. New and existing resources that will be used to meet Mid-Term Reliability obligations adopted by D.21-06-035³³ and the supplemental procurement ordered by D.23-02-040 and D.26-02-057.
<p>IV. Action Plan A. Proposed Procurement Activities and Potential Barriers</p>	<p>The retail seller should describe the solicitation strategies for the RPS resources identified in their Conforming Portfolios. This description should include:</p> <ol style="list-style-type: none"> 1. Proposed RPS procurement activities as required by Commission decision or mandated procurement. 2. Procurement plans and resource viability for each <u>new</u> RPS resource identified. 3. The type of solicitation. 4. The timeline for each solicitation. 5. Desired online dates.

³² Each retail seller is directed to submit at least one “Conforming Portfolio” that meets its proportional share of the required GHG targets when it files its individual IRP on August 10, 2026. Retail sellers may also submit an additional “Preferred” Conforming Portfolio that represents their individual goals that may go beyond the requirements of the Conforming Portfolio. See *Administrative Law Judge’s Ruling Setting Requirements for Individual Integrated Resource Plans due June 1, 2026*, dated January 16, 2026, at 8, and see also Administrative Law Judge Julie A. Fitch’s email ruling, dated March 9, 2026, granting retail sellers an extension to file their individual IRPs no later than August 10, 2026.

³³ Load Serving Entities are required to submit procurement information twice yearly, consistent with D.20-12-044 requirements, to show progress toward the capacity procurement requirements adopted in D.21-06-035.

	<p>6. Other relevant procurement planning information, such as solicitation goals and objectives.</p>
<p>IV. Action Plan A. Proposed Procurement Activities and Potential Barriers</p>	<p>Retail sellers should provide a summary of the potential barriers to implementing their Conforming Portfolios as they relate to RPS resources. The section should include:</p> <ol style="list-style-type: none"> 1. Key market, regulatory, financial, or other resource viability barriers or risks associated with the RPS resources coming online in retail sellers’ Conforming Portfolios. 2. Key risks associated with the potential retirement of existing RPS resources on which the retail seller intends to rely in the future.

All retail sellers in the RPS proceeding are required to become parties to the IRP proceeding (R.25-06-019).³⁴

IV.C.2 Responsiveness to Local and Regional Policies: All retail sellers shall explain how their RPS Plan comports with their respective company or local and regional policies. For example, retail sellers should describe how local and regional policies are incorporated in their RPS procurement quantities, generation attributes, bid selection criteria, and overall RPS Planning process. For many retail sellers, this may include consideration of regional climate action plans, air quality district plans, transportation plans, and land use plans, among

³⁴ R.20-05-003, at 20, Ordering Paragraph 2. [“All load-serving entities subject to Public Utilities Code Section 454.51 and 454.52 shall be respondents to this proceeding.”]

others. Also, retail sellers should describe whether any unique regional attributes impact RPS Plan development (*e.g.*, if a CCA has established goals that exceed State's RPS mandates, or an IOU is addressing once-through cooling retirements). Retail sellers should include information on their strategies and planning mechanisms to achieve those goals through their RPS procurement activities.

IV.D Lessons Learned – Assessment of RPS Portfolio Supplies and Demand: For all retail sellers, the assessment of supply and demand shall describe and incorporate RPS lessons learned. Descriptions of lessons learned should address, at a minimum, procurement planning, approaches to long-term procurement, and RPS trends and anticipated future trends.

It is insufficient to state that a retail seller has not yet learned any lessons, as all retail sellers should be engaged in prudent and proactive risk mitigation to ensure customers receive safe, reliable, affordable, and equitable electric service. New CCAs and ESPs are not exempt from this section and should look to lessons learned across other retail sellers' prior RPS filings to demonstrate how they will mitigate risk. For example, retail sellers can look to previous lessons learned reported by other retail sellers on RPS procurement activities such as, but not limited to, coordination on joint procurement, long-lead planning, and ratable procurement.

6.5. RPS Plan Section V: Project Development Status Update – Pub. Util. Code §399.13(a)(6)(D)

Pub. Util. Code §399.13(a)(6)(D) requires that the renewable energy procurement plan include a status update on the development schedule of all eligible renewable energy resources currently under contract. Current Commission forecasts indicate a need for developing new renewable resources to

meet system needs, RPS requirements, and greenhouse gas goals.³⁵ Accordingly, all retail sellers shall provide an update describing new RPS-eligible resources that are being developed but are not yet online, whether they are under contract or are retail seller owned.

First, retail sellers shall use the Project Development Status Update template to report development status updates for all their RPS-eligible resources that are currently under contract or are retail seller-owned, but not yet delivering generation.³⁶

Second, retail sellers shall also provide a narrative in this section that provides additional detail on the status of these projects' development. At a minimum, for each project in development, this narrative must include the following information:

1. Project or facility name, technology type, capacity procured from project, location (city and county), length of contract, commercial online date.
2. Any significant deviations in project development updates reported in previous RPS Plans.
3. Each facility's current development phase, which should differentiate projects whether they are in the pre-construction, construction, or post-construction development phase.
4. The status of any new required transmission line construction and/or any transmission upgrades necessary for each facility.

³⁵ See D.24-02-047 for more information on the Preferred System Plan (2023 PSP) portfolio adopting a 25 million metric ton (MMT) 2035 electric sector GHG planning target following the 2022-2023 IRP cycle.

³⁶ This template must be downloaded from the RPS Database system, which can be accessed at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

The status updates for a retail seller's projects in development shall also be reflected in the quantitative analysis in RPS Plan Section VIII: Renewable Net Short Calculations. Retail sellers should use this analysis to explain how their project development updates will impact their RPS net short and their procurement decisions for the next two years and on a planning horizon through 2036.

6.6. RPS Plan Section VI: Potential Compliance Delays – Pub. Util. Code §399.13(a)(6)(B)

Pub. Util. Code §399.13(a)(6)(B) requires that the renewable energy procurement plan include potential compliance delays related to the conditions described in certain portions of Pub. Util. Code §399.15. In this section, retail sellers shall describe in a narrative form any potential issues that could impact their RPS compliance, including any project development delays, reduced generation, and projected changes in load.

Potential issues could include, but are not limited to:

- Inadequate transmission capacity;
- Permitting delays;
- Insufficient eligible renewable energy resources supply;
- Unanticipated curtailment; and
- Unanticipated increase in retail sales.

Next, retail sellers shall also describe the steps taken to both account for and minimize these potential compliance delays. Retailers shall discuss how the potential compliance delays will impact the retail seller's RPS net short, progress towards 65 percent long-term procurement, and its procurement decisions. In addition, the potential compliance delays included in the written description shall be reflected in the quantitative analysis provided in RPS Plan Section VIII. If the retail seller does not anticipate any potential compliance delays, it shall justify its analysis using the information reported in RPS Plan Sections IV and VII to support the narrative provided in this section, Section VI.

**6.7. RPS Plan Section VII: Risk Assessment – Pub. Util.
Code §399.13(a)(6)(F)**

Pub. Util. Code §399.13(a)(6)(F) provides that the renewable energy procurement plan shall include an assessment of the risk that an eligible renewable energy resource will not be built or that construction will be delayed, with the result that electricity will not be delivered as required by the contract. As described below, retail sellers shall discuss compliance risk, risk modeling and risk factors, and lessons learned in subsections to Section VII of their 2026 RPS Plans.

VII.A Compliance Risk: Each retail seller shall provide a written assessment of the risks to their RPS portfolio that could impact their ability to achieve RPS compliance requirements.

First, retail sellers shall identify potential risks to their RPS portfolios and describe how these individual risks could impact achieving the long-term procurement requirement and overall RPS requirements. Retail sellers shall describe how the need to minimize compliance risks and project delays informs

their long-term procurement planning decisions. Potential risks to consider include, but are not limited to, developer delays, permitting, transmission development, supply chains, and financing.

Second, retail sellers must also describe the severity of the individual risks (*e.g.*, high, medium, low) they have identified and shall include concrete steps, with timelines, for how to overcome or mitigate compliance risks.

Third, the retail seller's risk assessment results shall be provided in the written narrative of RPS Plan Section VIII: Renewable Net Short Calculations and must be reflected in the quantitative analysis that is also provided in response to that section.

VII.B Risk Modeling and Risk Factors: Retail sellers shall provide details of the modeling and model(s) used (*e.g.*, deterministic, stochastic) to conduct annual risk assessments of their entire RPS portfolio.³⁷ These details should include specific inputs and assumptions to their risk assessment model. In addition, risk modeling should evaluate a range of risk factors, such as those described above regarding compliance delays and risks. The intent here is for retail sellers to provide sound and reasonable inferences based on both qualitative and quantitative modeling criteria.

VII.C Lessons Learned – Risk Assessment: Retail sellers shall include a discussion of lessons learned in assessing RPS portfolio risk, including how other retail sellers' risk assessments were used to guide the risk assessments of those with less experience serving retail load.

³⁷ Examples of two different approaches to risk modeling include deterministic models for expected and standard variabilities (*e.g.*, project failure rates and expected project delays) and stochastic models for uncertain variabilities (*e.g.*, retail sales fluctuations, project failure rates, curtailment, RPS generation variability).

Responses will be deemed deficient if they state the retail seller has no risks or if they only acknowledge that risk exists, without any description of proposed strategies to mitigate their portfolio's risk(s). A thorough risk assessment should include a detailed, historical understanding of lessons learned, a reflection on current trends and forecasts, and probabilistic and statistical models that project what could occur under different circumstances.

6.8. RPS Plan Section VIII: Renewable Net Short Calculations – Pub. Util. Code §399.13(a)(6)(A), (D), and (F)

Pub. Util. Code §399.13(a)(6)(A) requires that the renewable energy procurement plan include an assessment of annual or multiyear portfolio supplies and demand to determine the optimal mix of eligible energy resources with deliverability characteristics that may include peaking, dispatchable, baseline, firm, and as-available capacity.

Pub. Util. Code §399.13(a)(6)(D) requires that the renewable energy procurement plan include a status update on the development schedule of all eligible renewable energy resources currently under contract.

Pub. Util. Code §399.13(a)(6)(F) requirements are provided *Supra*.

For this section, retail sellers shall provide both a narrative and quantitative response demonstrating how the results of their risk assessments described in Section VII of their 2026 RPS Plans have been incorporated into their 2026 renewable net short (RNS) calculations.

The narrative response for this section shall be clear regarding the quantitative progress made towards RPS requirements and the specific risks to the retail sellers' RPS Procurement Portfolios. The narrative in RPS Plan Section VII: Risk Assessment shall support the analysis provided in response to this section. The narrative response in this section shall also provide quantitative

data, methodologies, and calculations the retail seller relied upon to assess the retail seller's RPS portfolio needs and RPS procurement net short.

The quantitative analysis provided for this section shall include retail seller's long-term and short-term contracts through 2035 as well as any RPS-eligible procurement that has or will occur outside of the RPS program.^{38, 39} Retail sellers shall complete the quantitative response based on the most recently directed RNS methodology Ruling (RNS Ruling), following the Ruling's instructions for data input in Appendix B (Table 8).⁴⁰ The quantitative analysis provided shall consider the relevant qualitative discussion in RPS Plan Section VII: Risk Assessment. As outlined in the RNS Ruling, retail sellers shall use their internal risk analyses to make appropriate adjustments to their procurement and explain how this mitigates risk on all projects in their respective RPS portfolios. The quantitative response shall be provided in the Excel spreadsheet template that is posted on the RPS Database system.⁴¹

6.9. RPS Plan Section IX: Minimum Margin of Procurement (MMoP) – Pub. Util. Code §399.13(a)(5)(D)

Pub. Util. Code §399.13(a)(5)(D) requires that the Commission adopt an appropriate minimum margin of procurement above the minimum procurement level necessary to comply with the renewables portfolio standard to mitigate the

³⁸ For example, RPS-eligible procurement to replace generation from the retired San Onofre Nuclear Generation Station that will be applied towards RPS requirements should be included.

³⁹ Retail sellers shall distinguish RPS-eligible procurement between online generation and RPS facilities in development when calculating their RPS net short. Please refer to the *Administrative Law Judge's Ruling on Renewable Net Short*, May 21, 2014, issued in R.11-05-005.

⁴⁰ As of the date of this Ruling, the methodology directed in *ALJ's Ruling on Renewable Net Short*, May 21, 2014, issued in R.11-05-005, is the most recent renewable net short methodology.

⁴¹ The RNS template can be download on the RPS Database system at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

risk that renewable projects planned or under contract are delayed or canceled. This provision does not preclude an electrical corporation from voluntarily proposing a margin of procurement above the appropriate minimum margin established by the Commission. A minimum margin of procurement (MMoP) above the minimum RPS procurement level is necessary to comply with the RPS program's requirement for retail sellers to mitigate the risk that renewable projects under contract are delayed or terminated or projects do not perform as expected.

IX.A. MMoP Level: All retail sellers shall define in their proposed 2026 RPS Plans a MMoP assumed above the minimum procurement level and explicitly report their MMoP levels in this subsection. The MMoP must be reflected in retail sellers' risk-adjusted RPS eligible procurement provided in the quantitative response in RPS Plan Section VIII: Renewable Net Short Calculations and shall remain separate from retail sellers' voluntary margin of over-procurement (VMoP).⁴² Additional forecasted procurement beyond the identified risk associated with the MMoP, including excess procurement, should be identified as VMoP.⁴³ If the retail seller's assumed MMoP is not used in calculating a retail seller's net short provided in response to RPS Plan Section VIII, then the retail seller's RPS Plan will be rejected.

⁴² The need for additional procurement above a retail seller's risk-adjusted portfolio shall be explained and supported by the VMoP reported in the quantitative analysis (Row D). Retail sellers shall not have a VMoP in place of an MMoP but should only have a VMoP after establishing and quantifying an MMoP.

⁴³ See Appendix B of *ALJ's Ruling on Renewable Net Short*, May 21, 2024, issued in R.11-05-005. VMoP includes that margin of over-procurement to account for additional project/forecasting risk above a utility's projected risk-adjusted project failure rate in a given compliance year.

IX.A.1 MMoP Methodology and Inputs: Draft 2026 RPS Plans for all retail sellers shall include both a narrative and quantitative description of their risk-adjusted portfolio methodology and inputs required to inform a retail seller's proposed MMoP.

First, the assumptions used to calculate each retail seller's MMoP should be supported with quantitative information and should explain the implementation timeline for meeting higher-than-mandated renewable energy goals. In addition, since the MMoP process is intended to mitigate the numerous risks that may lead to RPS non-compliance, arbitrary quantifiers such as expected excess procurement or policy goal targets should not be used.

Second, while retail sellers may develop their own MMoP methodology, retail sellers shall provide a rationale for why their proposed minimum margin is reasonable. Retail sellers shall also demonstrate that the methodology is representative of and consistent with the retail seller's inputs, assumptions, and risk assessment in RPS Plan Sections IV through VII.

IX.A.2 MMoP Scenarios: Retail sellers shall describe any sensitivities or scenarios used to calculate the proposed MMoP for the 2026 procurement cycle and RPS Compliance Period 5 (2025-2027).

**6.10. RPS Plan Section X: Bid Solicitation Protocol,
Including Least-Cost Best-Fit (LCBF) Methodologies
– Pub. Util. Code- §399.13(a)(6)(C), D.04-07-029,
D.11-04-030, D.12-11-016, D.14-11-042,
and D.16-12-044**

Pursuant to Pub. Util. Code §399.13(a)(6)(C), 2026 RPS Plans shall include a bid solicitation protocol setting forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any.

X.A. Bid Selection Protocols: First, all retail sellers shall provide bid solicitation protocols for eligible renewable resources in their 2026 RPS plans. At minimum, the bid solicitation protocols shall include the following elements:

- Overview of the solicitation process, including a solicitation schedule;
- Description of bid evaluation criteria;
- Quantity of products being requested;
- Required deliverability characteristics of the resources;
- Online dates and term lengths;
- Locational preferences, if any;
- Copy of the applicable pro forma agreement(s). Note, if an IOU plans to use a renewable auction mechanism procurement process, then the IOU shall provide a pro forma agreement for that process. Additionally, if an IOU plans other types of RPS procurement that would require a specific pro forma agreement (*e.g.*, short-term procurement), then a description of the bidding protocol for that specific pro forma agreement shall also be included.

Second, retail sellers shall describe in detail how their solicitation process determines whether renewable energy resources are located in disadvantaged communities, pursuant to Pub. Util. Code §399.13(a)(8), and how their procurement decisions will give preference to resources in those communities.⁴⁴

Third, retail sellers' stated bid selection criteria should align with all sections of their RPS Plan, especially regarding stated needs, goals, and

⁴⁴ Pub. Util. Code §399.13(a)(8)(A) requires that in soliciting and procuring eligible renewable energy resources for California-based projects, each electrical corporation shall give preference to renewable energy projects that provide environmental and economic benefits to communities afflicted with poverty or high unemployment, or that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and GHG.

preferences of the retail seller. Solicitations shall be consistent with the portfolio supply and demand assessment provided in RPS Plan Section IV and the retail seller's renewable net short position in RPS Plan Section VIII.

Fourth, all retail sellers shall provide descriptions of any ongoing, planned, and proposed solicitation processes, including solicitation materials. Retail sellers should provide recent, current, and future solicitation materials to the Commission, including an active link, if one exists, to the public website where public materials can be found for all relevant solicitations. In addition, retail sellers should describe whether they are participating in joint solicitations with other retail sellers, and this information shall be consistently reported across all relevant retail sellers' RPS Plans for efficient CPUC review.

X.B. Solicitation Protocols for Renewables Sales: If an IOU intends to sell eligible renewable energy products as part of its 2026 RPS Plan, then it shall also submit a solicitation protocol setting forth its proposed sales solicitation process. At a minimum, the sales protocols shall include the following elements:

- Overview of the solicitation process, including a solicitation schedule;
- Description of bid evaluation criteria;
- Product attributes for the renewable energy products being offered for sale (*e.g.*, bundled / unbundled product, technology, location, etc.);
- Delivery dates and term lengths;
- Pricing (*e.g.*, fixed price, index price, etc.);

- A framework for determining the quantity of RPS volumes to sell in each solicitation, the target price, and the price floor⁴⁵;
- Copy of applicable pro forma agreements.

Each IOU should also include a section on lessons learned from its sale of excess RPS volumes authorized under its previous RPS Plans.

X.C. Least-Cost Best-Fit (LCBF) Criteria: Retail sellers shall also include a detailed description of their bid evaluation methodologies and “best-fit” attributes considered, pursuant to Pub. Util. Code §399.13(a)(9).⁴⁶ The description of retail sellers’ bid evaluation, or LCBF, methodologies, shall include the following considerations and requirements:

1. Retail sellers shall describe how bids will be valued and evaluated based on their evaluation methodology.
2. The LCBF methodology used shall be consistent with relevant Commission decisions.⁴⁷
3. When evaluating bids in their solicitations, retail sellers shall consider, at a minimum, the following attributes: energy and capacity value, congestion cost, locational preference, potential for curtailment, and operational flexibility.
4. Any qualitative measures or criteria in the LCBF methodology should also be described, including how these criteria are applied.

⁴⁵ Bilaterally negotiated REC sales agreements are subject to the same terms and pricing set forth in an IOUs’ Commission-approved REC sales framework and are subject to the Commission’s Tier 3 Advice Letter approval process if the terms deviate from the Commission.

⁴⁶ Pub. Util. Code §399.13(a)(9) requires that in soliciting and procuring eligible renewable energy resources, each retail seller consider the best fit attributes of resource types that ensure a balanced resource mix to maintain the reliability of the electrical grid.

⁴⁷ See D.04-07-029, D.11-04-030, D.12-11-016, D.14-11-042, D.16-12-044, and D.23-08-003.

5. If a retail seller's LCBF criteria does not include system reliability considerations then the retail seller's RPS Plan will be rejected.

6.11. RPS Plan Section XI: Safety Considerations

As stated in D.13-11-024, OP 3, all entities filing RPS Plans shall identify any safety consideration related to the information set forth in the RPS Plans. The Commission directive was made pursuant to its authority under Pub. Util. Code §451, which provides, in pertinent part, as follows:

Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.

This information will help the Commission assess a retail seller's safety culture and ensure that their deliverability of the renewable electricity follows safety considerations in a manner that is safe for customers and employees as required under Pub. Util. Code §451. If a retail seller's RPS Plan states that it has no safety considerations or fails to reflect any safety considerations, then the retail seller's RPS Plan will be rejected.

Therefore, in their RPS Plans, retail sellers shall describe business practices that reflect safety considerations in RPS-eligible generation procurement through negotiation and execution of power purchase agreements, contract management, and operation and maintenance of utility-owned generation.

For RPS compliance obligations achieved through non-utility owned generation, retail sellers shall describe how they incorporate safety provisions and standards in their contracts for the RPS-eligible resources. For example, the 2026 RPS plans shall include descriptions of any mandatory compliance requirements each retail seller will follow to ensure it meets all prudent electrical

practices, including all safety standards, safety requirements for plant visits by its employees, and requirements to comply with regional applicable laws and regulations relating to safety.

Regarding utility-owned generation, retail sellers should describe how they comply with applicable safety codes, including but not limited to the National Electric Safety Code, the Occupational Health and Safety Act, and any relevant state health and safety act requirements at generation facilities complying with California's RPS program.

If other safety factors are considered in a retail seller's RPS procurement and planning efforts, such as future land use impacts due to climate change (*e.g.*, sea level rise), Public Safety Power Shutoff (PSPS) events, wildfire risk mitigation, or a combination of these approaches to overall system and public safety, then retail sellers are encouraged to include them as well.

**6.12. RPS Plan Section XII: Consideration of Price
Adjustment Mechanisms – Pub. Util.
Code- §399.13(a)(6)(E)**

Pub. Util. Code §399.13(a)(6)(E) requires that renewable energy procurement plans include consideration of mechanisms for price adjustments associated with the costs of key components for eligible renewable energy resource projects with online dates more than 24 months after the date of contract execution.

Pursuant to Pub. Util. Code §399.13(a)(6)(E), each retail seller shall describe how price adjustments (*e.g.*, index to key components, index to Consumer Price Index, price adjustments based on exceeding transmission or other cost caps) will be considered and potentially incorporated into contracts for RPS-eligible projects with online dates occurring more than 24 months after the contract

execution date. Retail sellers should discuss how any potential price adjustments will maximize value for ratepayers and minimize potential risks to ratepayers.

6.13. RPS Plan Section XIII: Cost Quantification

Pursuant to Pub. Util. Code § 913.3, the Commission provides annual reports to the California Legislature that include aggregated cost data on all procurement contracts for eligible renewable energy resources approved by the Commission.⁴⁸ The Commission also reports to the California Legislature each year on the progress of the RPS program requirements, pursuant to Pub. Util. Code § 913.4.⁴⁹ To support the Commission's reporting to the Legislature under Pub. Util. Code §913.3 and §913.4, PG&E, SCE, SDG&E, BVES, Liberty Utilities LLC, and PacifiCorp are required to include the information described in Table 3, below, in their proposed 2026 RPS Plans. For the Commission to have complete information for statewide electric procurement costs, CCAs and ESPs shall also include this information in their 2026 RPS Plans.

While the Commission does not set rates for the CCAs and ESPs or approve their contracts, Pub. Util. Code §399.12(j)(2) states that “[a] community choice aggregator shall participate in the renewables portfolio standard program subject to the same term and conditions applicable to an electrical corporation.” The same applies to ESPs pursuant to Pub. Util. Code §399.12(j)(3). Therefore, CCAs and ESPs shall follow the same RPS planning requirements as electrical

⁴⁸ This report is referred to as the “Padilla Report.” See, e.g., CPUC, 2025 Padilla Report: Costs and Savings for the Renewables Portfolio Standard (Public Utilities Code § 913.3), available at <https://www.cpuc.ca.gov/-/media/cpuc-website/industries-and-topics/documents/energy/rps/2025/2025-padilla-report.pdf>.

⁴⁹ See, e.g., CPUC, 2025 California Renewables Portfolio Standard Annual Report, available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2025/2025-california-renewables-portfolio-standard-rps-annual-report.pdf>.

corporations, including providing the information described in Table 3 below in their 2026 RPS Plans. Further, the Commission uses cost data submitted in the RPS Plans to develop the annual RPS Costs and Cost Savings report.⁵⁰ This cost information is essential to understand the impact of retail seller procurement and renewable cost trends in California.

All retail sellers shall provide the information required in Table 3 below using the standardized Cost Quantification template that is available through the Commission's RPS Database.⁵¹ Retailers should indicate in the narrative if they are awaiting contract approval either by the Commission or their local governments or executive boards, as instructed in the template. Responses should be non-confidential to the greatest extent possible.

⁵⁰ Pub. Util. Code §913.3 requires the Commission to produce an annual RPS cost report to the legislature. The report is posted on the Commission's RPS website: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/energy-reports-and-whitepapers/rps-reports-and-data>.

⁵¹ The Cost Quantification template can be downloaded from the RPS Database system at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

Table 3
Required of Retail Sellers: RPS Procurement and Sales Information
Related to Cost Quantification

	Item	Description
1.	Actual Direct Expenditures and Revenue- per year	Total dollars expended and received for all Renewable Energy Credit (REC) transactions for every year from 2023-2025. ⁵² Figures shall be reported by resource and technology type and reported for each year.
2.	Actual REC Procurement (MWh) -per year	Total REC procurement for every year from 2023-2025, including any REC sales. Amounts shall be reported by resource and technology types and reported for each year.
3.	Forecast Direct Expenditures and Revenue - per year	Total forecasted dollars expended and received for all REC transactions to date (and approved to date for the utilities). Forecast Direct Expenditures shall be reported by resource and technology type and reported for each year from 2026-2036.
4.	Forecast REC Procurement (MWh) -per year	Total forecasted REC procurement to date (and approved to date for the utilities), including any planned REC sales. Forecasts shall be reported by resource and technology types and reported for each year from 2026-2036.
5.	Incremental Utility Rate Impact -per year	Total actual and forecasted annual utility rate impacts from RPS procurement from 2023-2036.

6.14. RPS Plan Section XIV: Impact of Transmission and Interconnection Delays – Pub. Util. Code §399.13(a)(2)(B)

Pursuant to SB 1174 (Hertzberg, Stat. 2022, ch. 229) electrical corporations that own electrical transmission facilities are required to annually prepare, and submit to the Commission, a report on any changes to previously reported in-

⁵² For all information provided in response to Table 3, REC-only contracts should be listed separately from contracts for specific generation sources.

service dates of transmission and interconnection facilities necessary to provide transmission deliverability to eligible renewable energy resources or energy storage resources. SB 1174 also requires the Commission to provide an annual systemwide assessment of delays to interconnection and transmission approvals for renewable energy or energy storage resources.⁵³ As such, electrical corporations shall: 1) complete the 2026 SB 1174 Data Reporting Template data request and upload the completed template into the RPS Database and (2) provide corresponding narrative summaries within RPS Plans. Instructions to complete the data request and RPS Plan narratives are described within the two sections immediately below.

Data Request: 2026 SB 1174 Data Reporting Template

For 2026 RPS Plans, electrical corporations that own transmission facilities shall use the 2026 SB 1174 Data Reporting Template to:

1. List all transmission projects that are currently in development and all that have come online between January 1, 2025 and December 31, 2025, whether the project is delayed or not.
 - a. “Transmission projects” include transmission and interconnection projects, as well as network upgrades, that are CAISO-approved or utility self-approved. A transmission project is defined as “in development” if it is in any stage of development (e.g., planning, permitting, engineering, construction) but is not yet online.
 - b. A transmission project is defined as “delayed” if the project’s original in-service date is earlier than it’s currently planned in-service date or the project’s actual in-service date (denoting the project is online).

⁵³ Pub. Util. Code §913.4(g).

- c. An “original in-service date” is defined as the expected in-service date when the project was first approved by CAISO, or when the first business use case was approved by the utility (for utility self-approved projects).
2. Provide key information about each transmission project including, when applicable, it’s reason for delay, delay resolver, permitting status, the queue number for each in-development resource that depends on the transmission project, and all other information requested within the “Transmission Projects” tab of the data reporting template.
3. List all in-development renewable energy and energy storage resources, with executed interconnection agreements, that are expected to interconnect within the utility’s service territory. This includes resources within the CAISO, WDAT, or other interconnection queues.
 - a. A resource is defined as “in-development” if it has been accepted into an interconnection queue and is proceeding towards coming online but is not yet in-service.
4. Provide key information about each renewable energy and storage resource, such as technology type and nameplate capacity, and all other information requested within the “Energy & Storage Resources” tab of the data reporting template.

The 2026 SB 1174 Data Reporting Template is available in the RPS Database.⁵⁴

RPS Plan Narrative Summary

⁵⁴ The 2025 SB 1174 Data Reporting Template can be download on the RPS Database system at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

In addition to providing the data requested within the 2026 SB 1174 Data Reporting Template (Template), electrical corporations that own electrical transmission facilities shall provide a narrative summary (narrative, narratives, or narrative summary) of the data provided within its' RPS Plan. Any quantitative information within narrative summaries shall be derived solely from the data within 2026 SB 1174 Data Reporting Template and not from other sources. The narrative summary shall include reference to the data in the Template. The Template shall be attached to the RPS Plan, which shall be referenced within the narrative.

The narrative shall be consistent with other RPS Plan sections that also discuss RPS compliance risks. The narrative shall include the following sections:

1. **Transmission Projects Online in 2025 and In Development** – A summary of reported transmission projects that includes:
 - a. Total number of projects that have come online from January 1, 2025 to December 31, 2025;
 - b. Total number of projects in development; and
 - c. Total number of projects identified in (a) and (b) with actual or planned in-service dates later than original service dates.
2. **Renewable Energy & Storage Resources In Development** – A summary of reported in development renewable energy and energy storage resources that includes:
 - a. Total number of resources in development;
 - b. Total capacity (MW) of resources in development;
 - c. Total capacity (MW) of in-development resources whose ability to meet their expected in-service dates depends on the completion of delayed transmission projects (identified in 1.c).

3. **Transmission Project Reasons for Delay** – A summary of the in-service date change reasons identified within the Template (“Transmission Projects” tab) for both delayed but completed in 2025 and delayed in development transmission projects. Include the table below aggregated by in-service date change reason. Text in gray is for illustrative purposes only and shall be replaced by the reported data. Add rows to the table as needed and include:
- a. Total number of delayed transmission projects reported;
 - b. Median delay times for delayed transmission projects reported (in months); and
 - c. Total capacity (MW) of renewable energy and energy resources in which in-service is dependent on the completion of a delayed transmission project (identified in 1.b).

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

Reason for Delay (in-service date change reason)	(a) Delayed Transmission Projects	(b) Median Delay Times for Delayed Transmission Projects (months)	(c) Capacity of dependent renewable energy and energy resources (MW)
Example Delay Reason #1 (Financing, Land Rights, Weather, etc.)	40 (total number of projects reported)	8.5 (median calculated based on actual project delay times reported)	1000 (total resource capacity if dependent on delayed transmission projects)
Example Delay Reason #2 (Financing, Land Rights, Weather, etc.)	40 (total number of projects reported)	8.5 (median calculated based on actual project delay times reported)	1000 (total resource capacity if dependent on delayed transmission projects)
Example Delay Reason #3 (Financing, Land Rights, Weather, etc.)	40 (total number of projects reported)	8.5 (median calculated based on actual project delay times reported)	1000 (total resource capacity if dependent on delayed transmission projects)

4. **Most Significant Transmission Project Reasons for Delay**
 - A summary of the most significant in-service date change reasons identified within the Template (“Transmission Projects” tab). Based on table 4, discuss:
 - a. The three (3) reasons for delay that have contributed to the greatest number of completed and in development transmission projects delays;
 - b. The three (3) reasons for delay of completed and in development transmission projects that have the longest median delay times (in months); and
 - c. The three (3) reasons for delay where delayed in development transmission projects (not operational) have the greatest dependent capacity (MW) of renewable energy and energy storage resources.
5. **High-Impact Transmission Projects** – List and describe the three (3) delayed in development transmission projects reported that have the greatest number of dependent capacity (MW) of renewable energy and energy storage resources. Include the following:
 - a. The name of the transmission project.
 - b. The reason for delay identified for the project.
 - c. How long the project is delayed (in months).
 - d. How many renewable energy and renewable storage resources and how much total capacity (MW) are dependent on the transmission project.
 - e. What mitigation efforts have been done to address the project’s delay.
 - f. What mitigation efforts will be done in 2026 and 2027 to address this project’s delays.
 - g. Any further context regarding the project’s delay, including additional reasons for delay not already provided.
6. **Permitting Delays** – If any completed in 2025 or in development projects were delayed due to Permitting, please discuss the following:

- a. Which types of Permitting delays have had the greatest impact on dependent renewable energy and storage resources (MW)?
 - b. Which types of Permitting complexities have led to the longest project permitting delays?
 - c. Which permitting agencies (state, federal, county, and city) have a significant role in reducing permitting times and associated delays and why?
 - d. What reforms to permitting processes would lead to faster development timelines for transmission and interconnection projects?
 - e. How have state level permitting reforms, such as GO-131E, impacted transmission and interconnection development timelines?
7. **Mitigation Efforts** – Describe mitigation efforts and business process improvements that the utility took in 2025 to address the most significant reasons for delays to transmission and interconnection in-service dates. Give specific examples of the effects of these efforts on renewable energy and storage resource development.
8. **Projects Completed Early** – If any transmission projects were completed early in 2025 (came online before its “original in-service date”, defined above), please discuss factors that contributed to an early completion.

6.15. Appendix A: Redlined Version of Draft 2025 RPS Plans Required

Each retail seller shall provide a “redlined” version of the 2026 RPS Plan to identify all changes from its Final 2025 RPS Plan to the Commission’s Energy Division Staff to facilitate review of the draft 2026 RPS Plans. The redlined version shall also be made available to any party who requests a copy.

7. Resources for RPS Plans

The Commission staff has compiled a list of resources on the Commission’s website for reference in developing RPS Plans. Staff encourages

retail sellers to review the resources posted on the Commission's RPS Procurement webpages, which include this Ruling, and a Frequently Asked Questions for RPS Plan submissions.⁵⁵ The templates required for draft 2026 RPS Plans can be downloaded from the RPS Database system.⁵⁶

8. Requirements for Document Filings and Data Submissions

This proceeding will follow the electronic service protocol set forth in Rule 1.10. All parties to this proceeding shall file and serve RPS Plan documents following the schedule in Attachment A. Although Rule 1.10 requires service on the Administrative Law Judge (ALJ) of both an electronic and a paper copy of filed or served documents, parties are directed to only serve ALJs Gruen and Atamturk electronically in this proceeding.

All retail sellers shall submit the public and confidential versions of their 2026 RPS Plans and the native file versions of the required Microsoft Excel spreadsheets for the Renewable Net Short calculations, Project Development Status Update, and Cost Quantification to Energy Division staff through the RPS Database system. This submission of the native file versions of the Excel spreadsheets is in addition to including the required data in the retail sellers' RPS Plan.

The RPS Database can be accessed at: <https://rpsd.cpuc.ca.gov>. Retail sellers shall register to login to the system and access the templates.

⁵⁵ The CPUC RPS Procurement website is located here: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-procurement-plans>.

⁵⁶ The templates can be downloaded from the RPS Database at: <https://rpsd.cpuc.ca.gov>. Registration is required to login to the system.

9. Submission of Information with Claim of Confidentiality

The information in the RPS Plans should be non-confidential, to the greatest extent possible. If there is a request for confidential treatment of information, the procedures outlined in D.06-06-066, as modified by D.21-11-029 are applicable.⁵⁷ It is important for retail sellers to orient their year-specific redactions based on the year filing is made. 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.⁵⁸

In addition to following Commission filing requirements, retail sellers are reminded to use the RPS Database to send Energy Division unredacted copies of all RPS Plan documents, including Microsoft Excel spreadsheets.

10. Schedule

Parties may file comments and reply comments on the RPS Plans per the schedule outlined in Attachment A. We are not seeking comments on the Ruling as the requirements are well established at this time.

After reviewing the record in the proceeding, the Commission will accept, modify, or reject each plan or Supplement as required by Pub. Util. Code §399.13(a)(1) and (c).

11. Ex Parte Communications

Ex parte communications are permitted as described in Pub. Util. Code § 1701.1 and § 1701.3. Parties and interested persons are advised that, to the extent that the requirements of Rule 8.1 *et seq.* deviate from Pub. Util. Code §1701.1

⁵⁷ D.06-06-066 was modified by D.07-05-032 and D.08-04-023. The references to D.06-06-066 here include the modifications made by D.07-05-032 and D.08-04-023.

⁵⁸ See D.24-12-035 at 68 and OP 50.

and §1701.3, as amended by SB 215, effective January 1, 2017, the statutory provisions govern.

In a ratesetting proceeding involving hearings, *ex parte* communications are permitted only if consistent with certain restrictions and are subject to reporting requirements. (*See* Pub. Util. Code §1701.3(c) and Rules 8.2, 8.3, 8.4, and 8.5.) Parties shall electronically serve all three-day notices required by Rule 8.2(c)(2) for all *ex parte* meetings with decision-makers to the assigned Commissioner, the ALJs, and the service list of this proceeding.

IT IS RULED that:

1. No later than June 12, 2026, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall each file a proposed 2026 Renewables Portfolio Standard Procurement Plan that addresses the elements stated herein.
2. No later than June 12, 2026, Bear Valley Electric Service Company and Liberty Utilities LLC shall file a proposed 2026 Renewables Portfolio Standard Procurement Plan that addresses the elements stated herein.
3. PacifiCorp may use its IRP off-year supplement to satisfy the requirement to prepare a renewable energy procurement plan that addresses the elements stated in this ruling.
4. No later than June 12, 2026, each Community Choice Aggregator shall file a proposed 2026 Renewables Portfolio Standard Procurement Plan to address the elements stated herein.
5. No later than June 12, 2026, each Electric Service Provider serving electricity to customers in California shall file a proposed 2026 Renewables Portfolio Standard Procurement Plan to address the elements stated herein.

6. The procedural schedule for the Commission’s consideration of the 2026 Renewables Portfolio Standard Procurement Plans is outlined in Attachment A. This schedule may be adjusted as needed by the assigned Commissioner or Administrative Law Judge.

7. All retail sellers shall include an officer verified checklist using the uniform template in Attachment B, which is also the template that should be used to draft their 2026 Renewables Portfolio Standard Procurement Plans, responding to all sections unless otherwise noted on the template in Table 1 of this Ruling.

8. The Electric Service Providers and Community Choice Aggregators that shall comply with this ruling are identified in Appendix C and D of this ruling. Any retail sellers that decertify in 2026 before the proposed decision is published shall file a motion for exemption from filing final Renewables Portfolio Standard (RPS) Plans and future filings in the proceeding informing the Commission of their future RPS procurement plans.

Dated March 27, 2026, at San Francisco, California.

 /s/ JOHN REYNOLDS
John Reynolds
Assigned Commissioner

 /s/ DARRYL GRUEN
Darryl Gruen
Administrative Law Judge

Attachment A

**Procedural Schedule
2026 Renewables Portfolio Standard
Procurement Plans**

Process Details	DATE
Assigned Commissioner’s Ruling setting scope and schedule for annual RPS Plans	March 26, 2026
IOUs, Small Utilities, ESPs and CCAs file and serve draft annual RPS Plans	June 12, 2026
PacifiCorp files 2026 Off-Year Supplement	July 15, 2026
Comments on RPS Plans	July 13, 2026
Motions requesting an evidentiary hearing. Any such motions shall identify all material issues of fact. (note: If a motion is filed and granted, the ALJ may need to issue a revised schedule.)	July 13, 2026
Reply comments on RPS Procurement Plans	July 27, 2026
Motion to update RPS Plans [note 1 below]	July 27, 2026
Commission votes on Proposed Decision	Quarter 4, 2026
IOUs, Small Utilities, ESPs and CCAs file final annual RPS Plans	30 days from the effective date of the Decision
IOUs issue Request for Offers for Solicitations or otherwise pursue approved RPS Procurement Plan	10 days after Final RPS Plan filings, unless extended by Energy Division

Note 1: Updates are not intended to alter the form and format of the Plan but may be appropriate for limited elements based on changed circumstances or recent information (*e.g.*, new legislation, recent Commission decision, new regulation of the California Independent System Operator, harmonization of definitions within contract for specific terms).

(END OF ATTACHMENT A)

Attachment B

2026 RPS Procurement Plan Checklist and RPS Plan Template

The Checklist shall be filed with the RPS Procurement Plan and include verification.

2026 RPS Procurement Plan Checklist- Task Completed

Officer Verification

Retail seller name:	YES/ NO	NOTES
I. Summary of Major Changes to RPS Plan		
II. Executive Summary Key Issues		
III. Compliance with Recent Legislation and Impact of Regulatory Changes		
IV. Assessment of RPS Portfolio Supplies and		
IV.A Portfolio Supply and Demand		
IV.A.1 Long-term Procurement		
IV.B Portfolio Diversity and Reliability		
IV.B.1 Forecasting for Increased Transportation Electrification		
IV.B.2 Curtailment Frequency, Cost, and Forecasting		
IV.C Portfolio Optimization		
IV.C.1 Conformance with the IRP Proceeding		
IV.C.2 Response to Local and Regional Policies		
IV.D Lessons Learned – Assessment of RPS Portfolio Supplies and Demand		
V. Project Development Status Update		
VI. Potential Compliance Delays		

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

I am an officer of the [reporting organization] herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet templates used within this filing have not been altered from the version issued or approved by Energy Division.

Executed on [insert date] at [insert City and State].

[Insert Electronic version of Signature]
 [Insert Name, Title, Organization and Contact Information]

(END OF ATTACHMENT B)

Attachment C

List of Registered ESPs Required to File 2026 RPS Procurement Plans as of the Date of This Ruling

1. 3 Phases Renewables, Inc.
2. BP Energy Retail Company California LLC (formerly EDF Industrial Power Services (CA), LLC)
3. Calpine Energy Solutions, LLC
4. Calpine Power America-CA, LLC (dba Champion Energy Services, LLC)
5. Commercial Energy of Montana, Inc. (dba Commercial Energy of California)
6. Constellation NewEnergy, Inc.
7. Direct Energy Business
8. Gexa Energy California, LLC*
9. Just Energy Solutions*
10. Palmco Power CA, LLC*
11. Pilot Power Group, LLC
12. Praxair Plainfield, Inc.*
13. Shell Energy Solutions (Shell Energy North America (US), L.P.)
14. Tenaska Power Services Co.*
15. The Regents of the University of California
16. Tiger Natural Gas, Inc.*
17. Volt Energy LLC

*The Commission determined in D.13-11-024, D.17-12-007, D.19-02-007, D.19-07-007, D.19-12-042, D.21-01-005, and D.25-12-025 that EnerCal USA, LLC, Liberty Power Delaware, LLC, Praxair Plainfield, Inc., Palmco Power CA, Liberty Power Holdings, LLC, Mansfield Power and Gas, Tiger Natural Gas, Tenaska Power, Tenaska California Energy Marketing, Gexa Energy California, American Power Net, Just Energy, and Brookfield Renewable Energy Marketing US LLC do not need to file RPS Procurement Plans if they continue not serving any retail customers. If any of the ESPs begins to serve retail customers in the future, they shall immediately file an RPS Procurement Plan. The Commission determined in D.19-02-007 that new ESPs shall file their RPS plans upon registering with the Commission or 90 days prior to delivering load, whichever event occurs first.

(END OF ATTACHMENT C)

Attachment D

List of Active CCAs Required to File 2026 Procurement Plans as of the Date of this Ruling

1. Apple Valley Choice Energy
2. Ava Community Energy
3. Central Coast Community Energy
4. City of Palmdale
5. City of Pomona
6. City of Santa Barbara
7. Clean Energy Alliance
8. Clean Power Alliance of Southern California
9. CleanPowerSF
10. Desert Community Energy
11. King City Community Power
12. Lancaster Choice Energy
13. Marin Clean Energy
14. Orange County Power Authority
15. Peninsula Clean Energy
16. Pico Rivera Innovative Municipal Energy
17. Pioneer Community Energy
18. Rancho Mirage Energy Authority
19. Redwood Coast Energy Authority
20. San Diego Community Power
21. San Jacinto Power
22. San Jose Clean Energy
23. Silicon Valley Clean Energy
24. Sonoma Clean Power Authority
25. Valley Clean Energy Alliance

* The Commission determined in D.17-12-007 that new CCAs shall file their RPS Plans upon registering with the Commission or 90 days prior to delivering load, whichever event occurs first.

(END OF ATTACHMENT D)