

Integrated Resource Planning (R.20-05-003)

2021 IRP Data Request

Filing Requirements Overview

1. Background:

In accordance with the September 24, 2020 Scoping Memo, D.19-11-016 Ordering Paragraph 13, and D.20-12-044 Ordering Paragraph 1, and the July 8, 2021 ALJ Fitch's Ruling, all load serving entities (LSEs) who fall within the Commission's authority for Integrated Resource Plan (IRP) proceeding are required to file updated electricity procurement-related data, both for general procurement and procurement to satisfy the requirements of D.19-11-016 and D.20-12-044, by no later than September 1, 2021. LSEs are also required to submit partial data on August 2, 2021 covering any resources that have come online since July 1, 2020 or are expected to come online in 2021 (with projected contract online dates in 2021). This shall be filed in a format specified by the Commission staff and made available no later than July 1, 2021.

The template, Resource Data Template version 2 (RDTv2), is posted on the CPUC IRP website along with instruction and FAQ document. Each LSE should fully and accurately complete the RDTv2 in a way that adheres to the compliance requirement explained in this document, RDTv2 User Guide, and FAQ document. Failure to do so may subject the LSE to penalty under the IRP Citation Program.

2. Purpose:

This document guides LSEs and provides an overview of this data request and the compliance obligations, as well as instructs LSEs on how to file their RDTv2 and supporting documents with the CPUC.

3. General Instruction:

- A. All LSEs who fall within the Commission's authority for Integrated Resource Plan (IRP) proceeding are required to file updated electricity procurement-related data, both for general procurement and procurement to satisfy the requirements of D.19-11-016 and D.20-12-044.
- B. LSEs are required to provide contract information and monthly energy and capacity procurement data, by contract, year, and month about the contractual status and development status of each individual electricity resource included in their 2020 IRP portfolios. This includes:
 - a. All executed and in development resources with delivery start dates on or after January 1st, 2021, and before January 1st, 2031.

- LSEs should report the already executed contracts as of this filing, regardless of whether the resource is currently online or will come online in the future. This applies to the new resources that LSEs contracted/added to their portfolios beyond what they reported in their 2020 IRP portfolios.
 - LSEs are not required to report contracts that they plan to execute in the future unless it is towards the procurement obligations in D.19-11-016. This applies to the resources that were included in their 2020 IRP portfolios.
 - b. Resources toward achieving the electric capacity procurement requirements for 2021, 2022, and 2023 for LSEs with procurement obligations in D.19-11-016 (more information in the next section – section 4)
 - i. If an LSE opted-out of its procurement obligation under D.19-11-016, or was not assigned a procurement obligation under D.19-11-016, the LSE should not report any resources procured on their behalf in their RDTv2
 - ii. IOUs procuring on behalf of opt-out LSEs and those LSEs that were not assigned a procurement obligation should report the full occurring procurement.
- C. For purposes of determining the contract status, use August 1, 2021 as the cutoff date.
- D. LSEs should review “RDTv2 User Guide” as Commission Staff provided comprehensive instructions in the workbook itself.
 - a. Staff developed an error checking macro as part of RDTv2, based on the rules and relationships spelled out in the user guide. LSEs need to trace the errors identified by the macro, and correct them before submitting.
- E. CAM resources: CAM resources should not be reported in the RDTv2 either by the LSE that holds the contract or the LSE receiving an allocation. This does not apply to the resources towards the procurement obligations in D.19-11-016 (see 3.B.b)

4. Detailed instruction on IRP D.19-11-016 and D.20-12-044 requirement:

Per Ordering Paragraph (OP) 1 in D. 20-12-044, all LSEs with procurement obligations in D.19-11-016 who did not opt out of providing capacity for customers must submit compliance filings for backstop procurement on February 1 and August 1 of 2021, 2022, and 2023, in a format developed and disseminated by the CPUC for the publicly-available portion, containing information about progress toward achieving the electric capacity procurement requirements for 2021, 2022, and 2023.

In addition to the RDTv2, self-providing LSEs must also submit information addressing Milestone 1, Milestone 2, and Milestone 3 for 2021, 2022, and 2023 in the September 1 compliance filing, as detailed in D.20-12-044.

LSEs are not required to re-submit supplemental documentation already provided to the CPUC with the February 1, 2021 compliance report, unless those materials have been amended or modified. LSEs must provide data in the RDT v2.0 for every D.19-11-016 resource, even if the data has not changed since the last filing.

LSEs that already provided verification of online status should review the below requirements and submit any missing or insufficient documentation.

LSEs must include a crosswalk cover page with their submittal that covers the following: document name, applicable resource, milestone requirement this document meets (i.e. site control or online status), applicable tranche or tranches, location of document in filing LSEs submitting a remediation plan should include it in their crosswalk table. Below is a table LSEs may use for this cover page.

Please submit supplemental documentation in a searchable format.

LSE Name D.19-11-016 September 1, 2021 Procurement Report (sample below)

Document Name	Resource Name	Milestone Requirement Met	Tranche(s)	Location
LSEname_developer_ABCsolar_PA	ABCsolar	Milestone 1 – executed contract	1 & 2	Pg 17 of PDF

- For compliance with Milestone 1, self-providing LSEs must provide executed contracts for new construction, signed interconnection agreements, and provide evidence of site control with signed land leases or title deeds.
 - Executed contracts must verify the NQC value procured, or the LSE should note where else in their filing the CPUC may verify NQC value.
- For compliance with Milestone #2, LSEs must provide a "notice to proceed" or similar contractual evidence of construction commencement. Additionally, LSEs meeting part of their obligation with imports, demand response or sale of excess generation must submit executed contracts for these resources.
 - If the LSE does not have the "Notice to Proceed" documentation, they may submit what similar evidence they are able to provide that serves a similar purpose (i.e. updates on construction milestones).
 - Imports may not be more than 20% of an LSE's total obligation
 - LSEs procuring demand response resources must provide load impact protocols when available. If applicable, the LSE should also submit progress on rule 21 permits for DR contracts involving BTM storage.
- For milestone #3, LSEs must provide evidence of online status and commercial operation. All tranche #1 resources must be online as of August 1, 2021. Please provide a copy of the COD notice you received. If that is not available (i.e. in the case of an existing resource), LSEs should provide where to find the resource on the CAISO Master Generating Capability list.
- Remediation Plan: If you perceive any possibility for delay or contract failure, please include a remediation plan that describes the source of the delay, possible remediation

that will be taken by the LSE, whether the LSE has notified the CPUC previously of the delay, and what substitute resources the LSE may be able to procure.

- Any instructions included in this compliance guide, the RDT v2.0 user manual, or the RDT v2.0 supersede previous instructions. The format of the template has changed and some previous staff instructions and FAQs are no longer applicable.
- Please note that staff previously instructed LSEs to create multiple lines in the data template if a project met multiple tranches. This is no longer necessary due to the drop down list for the tranche column containing all possible combinations. Please only include one line for each project. If your contract has an NQC value that changes year to year, please include that additional information in a note.

5. Submission Date

Each LSE must submit a completed RDTv2 along with supporting materials to the CPUC by 5 PM on Wednesday, September 1, 2021.

Each LSE must also submit partial data to the Energy Division by 5pm on August 2, 2021 covering any resources that have come online since July 1, 2020 or are expected to come online in 2021 (with projected contract online dates in 2021). The procurement data required on August 2, 2021 should be submitted to Energy Division only.

6. Submission instruction

- Informal Provision:** Please submit all materials to irpdatarequest@cpuc.ca.gov through the CPUC FTP website. The LSE should file the RDTv2 utilizing the instructions in this document and "RDTv2 User Guide". LSEs may consider some contractual information confidential and wish to file accordingly. In that case, LSEs need to submit two versions of their RDTv2s (confidential and public). Filers who do not already have a CPUC secure FTP account should follow the instructions on the [secure FTP site](#). From within the secure FTP application, users can send secure emails to CPUC staff with large attachments. This mechanism allows filers to transmit their complete filing to CPUC staff including any portions deemed confidential.

Before submitting, please change the RDTv2 file name using the following naming convention. The file name must contain the 3 elements below, in the order provided. Use an underscore to separate the two element. All letters should be in lower-case.

1. The lse's abbreviation, provided in the Resource Data Template's workbook in the "lse" tab

2. Confidential vs. Public: written as “confidential” or “public”
3. Version number, written as the letter "v", followed by a number. If you have to re-submit a file for any reason, increase this number by 1.

b. Formal Filing: Parties should also read carefully and follow Rule 1.5 through 1.14 of the Commission’s Rules of Practice and Procedure available here:

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K618/209618807.PDF>

Below is a guide to the basic steps, in anticipation of the likely needs of many LSEs in this proceeding. This guidance is not intended to modify, in any way, the requirements set forth in the Commission’s Rules of Practice and Procedure.

- **E-filing**

- When making the formal filing, LSEs are encouraged to utilize the Commission’s electronic e-filing system and select the document type “compliance filing.”
- When e-filed, documents must be PDF/A compliant (see Rule 1.13).
- All materials should be e-filed, including PDF/A compliant versions of public spreadsheet materials, EIA forms, etc.
- Filers should include the verification required by Rule 1.11.
- Filers should also include a certificate of service (service requirements are discussed further below).
- If a document is larger than 50 pages or 3.5 megabytes, the filer should instead file and serve a “notice of availability” with a link to the materials housed on its own web site in a publicly accessible format (see Rule 1.9(d)).
- The filing deadline is September 1, 2021 before 5 p.m.

- **Confidential Materials**

- The LSE should file the RDTv2 utilizing the instructions in this document and “RDTv2 User Guide”. LSEs will likely consider contractual information confidential and wish to file accordingly.

- Along with the confidential version of its materials, the LSE will need to separately file a “motion to file under seal” detailing the justification for keeping the material confidential, following the guidance in the Commission’s decision D.06-06-066 for these purposes (see Rule 11.4; there is also detailed guidance contained on the following page on the Commission’s Practitioner Page web site: <https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page> , look for link titled: “Filing Confidential Documents Under Seal (Rev. Nov 2013)).
 - The confidential version of the LSE’s materials may be submitted under seal in hard copy form, or if the material exceeds 3.5 megabytes, may be submitted on an archival DVD directly to the Docket Office. For more detailed guidance on this issue, also see the Practitioner’s Page at <https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page> , look for link titled: “Mixed Media Filings: Cutting Edge Filing Techniques to Accommodate Multiple & Voluminous Media Formats.”
 - Because of the COVID-19 situation, filers should hold off submitting the physical materials for the confidential filings to the Docket Office until 30 days after the Commission removes the COVID-19 restrictions; however, the motions to file under seal should still be electronically submitted by September 1, 2021, detailing the materials for which the LSE is seeking confidential treatment.
 - LSEs should also ensure that confidential materials are delivered to Commission staff electronically immediately, regardless of the formal filing status, so that staff can begin analysis (see further details below).
- **Service of Materials**
 - All public versions of filed materials should be served on all members of the “service list” of this proceeding (See Rule 1.13).
 - The service list can be downloaded from the docket card for this proceeding or from the Commission’s service list webpage, by clicking on “download comma-delimited file.”
 - Email service is generally preferred, but has some limitations:
 - Some email servers will not accept or deliver messages to groups of more than 100 addresses. Thus, serving the whole service list may require dividing up distribution into smaller groups of recipients.

- Document size is also limited if serving by email, and thus a notice of availability with a public web site link is preferred for large documents and underlying materials. Such an approach will also make spreadsheet materials more accessible and useful.
- Service should be performed on the same day as filing (September 1 , 2021), before 5 p.m.

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