

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

August 1, 2022, IRP Compliance Filing & Data Request

Filing Requirements Overview

1. Background:

In accordance with D.20-12-044 Ordering Paragraph 1, all load-serving entities (LSEs) who fall within the Commission's authority for Integrated Resource Plan (IRP) proceeding with procurement obligations included in Decision (D.) 19-11-016 who did not opt-out of providing capacity for their customers shall make compliance filings on February 1, 2022.

For purposes of keeping CPUC's project status information up-to-date, LSEs are also required to provide information on the following project types. LSEs that are not required to make a D.19-11-016 compliance filing may still be required to submit an RDTv3 due to one or both of the following requests:

- LSEs are also required to provide information for any projects intended to meet D.21-06-035 (the Mid-Term Reliability Decision). This is not a compliance report for D.21-06-035 and will not be used for compliance purposes.
- Additionally, LSEs should also include any projects planned, in review, or in development as of 8/1/2022, or online after 1/1/2022, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order.

The template, Resource Data Template version 3 (RDTv3), is posted on the CPUC IRP website (2022 IRP Cycle Events & Materials page) along with instruction documents. Each LSE should fully and accurately complete the RDTv3 in a way that adheres to the compliance requirement explained in this document and RDTv3 User Guide.

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 RDTv3 and supporting documents with the CPUC.

3. General Instructions:

- A. All LSEs who fall within the Commission's authority for the Integrated Resource Plan (IRP) proceeding with procurement obligations included in Decision (D.) 19-11-016 who did not opt-out of providing capacity for their customers are required to file updated procurement related data to satisfy the requirements of D.19-11-016 and D.20-12-044. Please see the detailed instructions in section 4.
- B. All LSEs who fall within the Commission's authority for the IRP proceeding are also required to provide information on projects intended to meet D.21-06-035 (the Mid-Term Reliability Decision). LSEs that have opted out of D.19-11-016, or were not assigned a requirement under D.19-11-016, are still required to provide information on their projects pursuant to

D.21-06-035, if they were assigned an obligation under that order. Additionally, LSEs should also include any projects planned, in review, or in development as 8/1/2022, or online after 1/1/2022, in the LA Basin local capacity area, even if not pursuant to either IRP procurement order. Please see the detailed instructions in section 5.

- C. For purposes of determining contract status, use August 1, 2022, as the cutoff date.
- D. LSEs should review “RDTv3 User Guide” as Commission Staff provided comprehensive instructions.
 - a. Similar to previous rounds, comprehensive error checking will be conducted, after submissions are received, based on the rules and relationships spelled out in the User Guide using RDT Error Checking, Aggregation and Reallocation Tool (RECART) version 3 (RECARTv3).
 - b. Staff developed an error checking macro as part of RDTv3, 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.

4. Detailed instructions 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 RDTv3, self-providing LSEs must also submit information addressing Milestone 1, Milestone 2, and Milestone 3 for 2021, 2022, and 2023 in the compliance filing, as detailed in D.20-12-044.

LSEs are not required to re-submit supplemental documentation already provided to the CPUC in a previous compliance report, unless those materials have been amended or modified. LSEs must provide data in the RDTv3 for every D.19-11-016 resource, even if the data has not changed since the last filing.

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 all supplemental documentation in a searchable format.

LSE Name D.19-11-016 August 1, 2022, Procurement Report (sample format and information below)

Document Name	Resource Name	Milestone Requirement Met	Tranche(s)	Location
<i>LSEname_developer_ABCsolar_PPA</i>	<i>ABCsolar</i>	<i>Milestone 1 – executed contract</i>	<i>1 & 2</i>	<i>Pg 17 of PDF</i>

- 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 #2 resources must be online as of August 1, 2022. 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 RDTv3 user manual, or the RDTv3, supersede previous instructions and should be followed. 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 the contract has an NQC value that changes from year to year, please include that additional information in a note. When something fundamental about the contract changes (e.g., the resource's nameplate is expanded), please enter them as separate contracts (in separate rows). For more details, please read section 8 of the RDTv3_UserGuide.

5. Detailed instruction on Project Progress Tracking Requests:

For purposes of keeping our project status information up-to-date, LSEs are also required to provide information on the following project types:

- LSEs are also required to include and provide information in the RDTv3 for any projects intended to meet D.21-06-035 (the Mid-Term Reliability Decision). This is not a compliance report for D.21-06-035 and will not be used for compliance purposes.
 - LSEs should include information for all applicable columns in the RDTv3.

- LSEs should not file any supplemental documentation for projects pursuant to D.21-06-035. This documentation will be filed when compliance reporting for D.21-06-035 begins.
- Projects pursuant to both D.19-11-016 and D.21-06-035 should include a note indicating how much capacity the LSE intends to apply toward each order.
- Please note that D.19-11-016 and D.21-06-035 include different rules for determining NQC for certain resources.
- Please note that compliance reporting for D.21-06-035 may take a different form than the columns included in this data request and will likely require more detailed information.
- Additionally, LSEs should also include any projects with contract statuses planned, development, or review as of 8/1/2022, as well as any projects that came online after 1/1/2021 in the LA Basin local capacity area, even if not pursuant to either IRP procurement order.
 - LSEs should use the sub-area column
 - LSEs should complete all applicable columns in the RDTv3 for these projects.
 - LSEs should not include any supplemental documentation for these projects, unless they are pursuant to D.19-11-016.

6. Submission Date

Each LSE must submit a completed RDTv3 along with supporting materials to the CPUC by 5 PM on Monday, August 1, 2022.

7. Submission instruction

- a. **Informal Provision:** Please submit all materials to irpdatarequest@cpuc.ca.gov through the CPUC FTP website. The LSE should file the RDTv3 utilizing the instructions in this document and “RDTv3 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 RDTv3s (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 RDTv3 file name using the following naming convention. The file name must contain the 5 elements below, in the order provided. Use an underscore to separate each element. All letters should be in lower-case.

1. The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse_names" tab
2. "rdtv3"
3. "38mmt"
4. Confidential vs. Public: written as "confidential" or "public"
5. 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 when preparing and submitting their filings, available here:

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

Below is a summary of 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, which are considered authoritative.

- **E-filing**

- When making the formal filing, LSEs are encouraged to utilize the Commission’s electronic e-filing system and select the document type “compliance filing.”
- When e-filed, documents must be PDF/A compliant (see Rule 1.13).
- All materials should be e-filed, including PDF/A compliant versions of public spreadsheet materials, EIA forms, etc.
- Filers should include the verification required by Rule 1.11.
- Filers should also include a certificate of service (service requirements are discussed further below).
- If a document is larger than 50 pages or 3.5 megabytes, the filer should instead file and serve a “notice of availability” with a link to the materials housed on its own web site in a publicly accessible format (see Rule 1.9(d)).
- The filing deadline is August 1, 2022, before 5 p.m.

- **Confidential Materials**

- The LSE should file the RDTv3 utilizing the instructions in this document and “RDTv3 User Guide”. LSEs will likely consider certain 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.”
 - 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 (August 1, 2022), 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.