

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

2021 IRP Data Request

Frequently Asked Questions

This document is a reference guide for LSEs 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. It provides clarifying instructions on how to fulfill the submission requirements. The questions included in this document reflect some of the questions IRP staff has received from various LSEs

This will serve as a living document. IRP staff will continue to update this document until the September 1 filing deadline with added guidance for LSEs as new questions arise. All updates will be posted to the [IRP Procurement Track](#) webpage.

Note: Questions marked with an asterisk () are the new/updated ones comparing to the previous version of this document posted in July 16, 2021.*

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1. How far into the future the requested monthly data should be provided?

Please report the monthly energy/capacity procured dates on or after January 1st, 2021, and before January 1st, 2031

2. Should LSEs provide information on just existing and known future procurement (e.g., D.19-11-016) or also additional generic resources to meet other goals (e.g., GHG level by 2030)?

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

3. *Error Checking Macro: LSEs found several discrepancies between the User Guide and RDTv2 error-checking macro. Please instruct on this.

Staff are aware of these issues. Please note the following.

- The User Guide is what LSEs need to follow. If there is any discrepancy in the macro, please still follow the User Guide and ignore the error(s) that the macro returns.
- We have updated the User Guide to reflect this.
- Similar to the last round, comprehensive error checking will be conducted based on the rules and relationships spelled out in the User Guide using RDT Error Checking, Aggregation and Reallocation Tool (RECART) version 2 (RECARTv2).
- Staff posted RDTv2 with updated/improved macro on 8/6. Considering that the RDTv2 that was released on July 1 is the final version, LSEs are not required to check their errors using the updated versions but are encouraged to do so prior to their final submission.
 - This can be done by simply copying/pasting the data and running the macro in the new version.
 - Because of the potential time delay between submission of the RDT by the LSE, and errors being flagged by RECART and returned to LSE, staff encourage LSEs to take this extra optional step.
 - Staff also encourage LSEs to continue providing their feedback about any issues they find.

4. What resource should LSEs use for contracts that were designated as "transfer_sale" or "transfer_purchase" in RDTv1?

Please use one of the following based on the contract:

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- **Inter LSE Transfers:** Transfers are to be entered by selecting the resource being either purchased or sold in the **resource** column (selected from the drop down list), indicating whether it is a purchase or a sale in the **buy_or_sell** field, and selecting the counterparty from the drop down list in the **special_counterparty** column. If the resource is being sold by the LSE to a non-LSE counterparty, select “non-LSE counterparty” from the drop down list.
- **suppliers_choice:** This listing is only for when the LSE is purchasing from a non-LSE counterparty AND the resource being procured is not unit specific or the LSE does not know the specific mix of generation. If the counterparty is an LSE, then please follow directions for either unspecified import or unspecified non-import resources. In the event of a supplier’s choice, the LSE is requested to select “suppliers_choice” in the drop down in the resource tab and use the **special_generator_supplier** field to name the non-LSE supplier with whom the LSE has a contract. Please also use the **special_mix** field to describe the estimated mix of resource types in the contract. Also estimate a special **_resource_nameplate** for the contract.

5. Please provide a complete example of how to enter information in the "special_mix" field, for both the MW and the % of total NQC options.

This refers to the technology mix of energy making up a contract. Please specify special_mix of the particular technology mix in the following form, using characters [and] as well as commas to delineate values within square brackets, as shown: “[techtype1, value1] [techtype2, value2]”. See additional examples below. For techtype please use only the following values (case insensitive): ct, ccgt, chp, solar, wind_low_cf, wind_hi_cf, hydro, battery, geothermal, biomass, biogas, nuclear. Please map technology type for each resource within mix to one of these values. The sum of values should either equal the total MW of the contract, or one, that is to say the values (value1, value2, etc) can either correspond to MW values corresponding to each resource in the mix, or fractions of total contract MW

- Example for MW: “[solar, 11] [battery, 2]”
- Example for the % of total NQC: “[wind_low_cf, .93] [battery, .07]”.

6. How should LSEs enter the following situation for a hybrid resource:

- Existing solar resource supplying energy and capacity in 2020-2022
- New storage resource added to existing solar resource beginning in 2023 to create a hybrid resource that can only charge from existing solar for 5 years (2023-2027)
- Beginning in 2028, the hybrid resource (existing solar + new storage) can charge from the grid

I. Should there be one unique contract or two or three?

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Three unique contracts, one specific for each line (a,b,c)

- II. **Should the storage be modeled as a separate storage contract, or as a hybrid contract?**

Please report this as a hybrid. “b” and “c” should be reported as hybrid.

- III. **How should we specify the existing solar resource and also the new storage resource so that the NQC is not flagged as exceeding the listed NQC for the existing solar resource?**

For “b” and “c” please provide the total NQC for the hybrid resource and also report these as “marginal_addition”.

7. **In the Monthly_gwh_mw sheet, for the column contract_gwh, if LSEs do not contract for a specific amount of GWh, should they forecast the expected generation from each resource and enter that value in this column?**

Please forecast monthly energy production for resources that do not have a specific GWh identified in the contract.

8. ***Please advise how LSEs should treat CAM resources, and CAM-like resources such as procurement being done for LSEs that opted out of the procurement issues in D.19-11-016.**

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

D.19-11-016 resources:

- 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
- IOUs procuring on behalf of opt-out LSEs and those LSEs that were not assigned a procurement obligation should report the full occurring procurement.

Please refer to the section 3.B of the “2021 IRP Data Request Overview” document.

9. **For portfolio deals, a breakdown of resource types and values is generally not known. In such a case, is it correct to assume that the RDT is asking for a reasonable estimate?**

Yes. Please provide a reasonable estimate.

10. **The ‘supplier_choice’ supertype should be applicable to contracts from any entity, not only non-LSE entities as the user guide specifies. We have had several supplier choice contracts with other LSEs.**

The ‘supplier_choice’ listing is only for when the LSE is purchasing from a non-LSE counterparty AND the resource being procured is not unit specific or the LSE does not know the specific mix of generation. If the counterparty is an LSE, then please follow directions for either unspecified import or unspecified non-import resources.

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11. The ‘online’ contract status is supposed to only be used for operational resources with an executed contract but is allowed with ‘new_’ and ‘existing_generic’ resource supertypes, which seems contradictory since the former wouldn’t be online and the latter presumably wouldn’t have an executed contract.

There could be some cases that LSEs need to use ‘new_’ and ‘existing_generic’ resource supertypes for online resources. For instance, when the specific resource name is not found among the resources in the RDT.

12. There is no field for contract delivery start date. Sometimes the delivery start is the same as the facility’s COD, but sometimes it is later.

That information will be obtained through the "Monthly_gwh_mw" tab as LSEs report the monthly energy/capacity procured for each contract.

13. What do we put in the ‘special_resource_nameplate’ field for a firm energy-only contract for which the nameplate capacity is unknown, or for a suppliers choice contract for which there are multiple resources?

Please provide a reasonable estimate of the nameplate.

14. Please define “marginal_addition”? Is there a type of addition that is not marginal, or does it mean any addition? And if an LSE is reporting an addition, should it only specify the added MW and GWh in the RDT?

Marginal additions refer to the resources that their capacity has been expanded (e.g. adding batteries to an existing solar facility, adding additional generators to an existing facility, ...) over the reporting time frame. For these resources, LSEs would still report the new total NQC but indicate expansion using the provided columns in the "unique_contracts" table. As an example, consider a storage resource that gets expanded with additional storage capacity in 2025:

	lse_unique_contract_id	resource	marginal_addition
Before expansion (before 2025)	id_A	Resource name	No
After expansion (after 2025)	id_B	Resource name	Yes

15. How do we tag RPS and RA sales that do not have designated resources that are going to non-LSEs?

These types of transfers are to be entered by selecting the resource being sold in the resource column, and select “non-LSE counterparty” from the drop down list in the buy_or_sell field. For the sales that do not have designated resources, please use one of the generic resource names.

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16. Please clarify if only executed and in-development resources are to be included in this template?

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

17. Will we need to include RA transactions that don't have deliveries beyond 2022?

Yes. Please report contracts that have deliveries on or after January 1st, 2021, and before January 1st, 2031.

18. For contracts with existing resources where LSE's receive 100% (or a fraction) of the RA, does the CPUC want the NQC fraction to be entered since the contract doesn't specify an NQC value or the expected monthly NQC values?

Please enter the NQC fractions, not the NQC estimates.

19. Do "PlannedExisting" and "PlannedNew" only apply for resources for which the associated contract is not yet approved? ("Contract is not yet in force...")?

Yes.

20. For contracts that are Evergreen, where there is no distinct term length, how should the contract end date be populated?

Please provide an estimate by going from earliest date to latest date.

21. Does "signed_contract_new_construction" field only apply for contracts counted towards D.19-11-016?

Please fill this field for all contracts.

22. What is the difference between storage_depth (Column K) and storage_duration_hours (Column P)? The definitions of the two seem to be the asking for the same thing in the User Guide.

Staff are aware of this issue. Please report the same value.

23. The User Guide instructs LSEs to create two rows for hybrid resources to differentiate when a resource can and can't charge from the grid. -- If these resources are being used for D.19-11-016, should the relevant D.19-11-016 information only be entered in one of the rows? Or should D.19-11-016 data be filled in for both rows? How do LSEs ensure this capacity isn't being double counted towards compliance?

Please fill in all the information for both rows. Include a note (Column AS) so we can ensure the capacity is not double-counted.

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24. Alameda County is missing from the drop down options in Column X, should LSEs use the 'AmedaCounty' option in the drop down?

That appears to be a typo. Please use the 'AmedaCounty' option in the drop down.

25. The User Guide instructs LSEs to enter 'NA' in Columns AH:AJ for resources that will be used for D.19-11-016 procurement but have not been reported in a previous progress report. However, 'NA' does not match the data validation restrictions for these cells

Please leave these Columns blank in this case (no need to enter NA). Please enter "NA for AH:AJ" in Column AS (notes column).

26. On page 10 of the User Guide instructs LSEs to enter '0' in the special_resource_nameplate column if a contract is energy only. On page 6, the User Guide instructs LSEs to estimate the nameplate for the resource. Can you please confirm how LSEs should fill out this column for (1) energy only contracts with a single resource, and (2) energy only suppliers choice contracts with a pool of facilities?

- For Case 1 – Please enter resource nameplate.
- For Case 2 – Please estimate total resource nameplates of the bundle of resources.

27. Should new hybrid resources without a CAISO Resource ID be reported as 'CAISO_Solar' or 'CAISO_Battery'?

In this case and similar cases, please choose resource based on the generating resource (here as CAISO_Solar), and provide the hybrid information in other columns.

28. The User Guide instructs LSEs to complete the 'special_generator_supplier' column for suppliers selling capacity. Should this column be completed for energy only contracts?

Yes. Please complete this column as we need the counterparty for sales.

29. Should the county column be left blank for suppliers choice contracts with resources in multiple locations? There is no option for multiple counties.

Yes. Please leave it blank and include a note (Column AS).

30. If a resource has local capacity attributes, but an LSE does not have them under contract, what should be entered in the capacity_area column?

Please enter the Local capacity area.

31. CAISO Resource IDs for some DR resources are not in the resource tab. What should LSEs enter?

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For existing DR programs, please select EXISTING_GENERIC_DR as the resource and enter the rest of the resource information. Please enter the CAISO Resource ID in the notes column.

32. It seems like we are not able to enter a value of '1' in the NQC fraction if known column in the monthly_gwh_mw tab. Please instruct.

LSEs are allowed to correct the formula in the event they run into this error.

33. Can you please confirm that this August 2, 2021 reporting deadline only applies to contracts for new resources that have or will come online in that time period, or does this apply to all procurement contracts with delivery dates within that 2020/2021 window?

It only applies to contracts for new resources that are online or expected to be online between July 1, 2020, and the end of 2021.

34. For Aug 2, if the reporting requirement only applies to contracts for new projects coming online 2020/2021, should an LSE with no relevant contracts submit any kind of notice to Energy Division informing them of such?

For August 2, please send an email to the Energy Division (irpdatarequest@cpuc.ca.gov) stating this.

35. Does this filing combine the RDT update and backstop procurement submission into one?

The data filing is combined. Further guidance on supplemental documentation for D.19-11-016 is included in the 2021 IRP Data Request Overview.

36. (a) Is it acceptable to replace a delayed project that was shown in February 2021 with a different resource in the August 2021 filing? (b) Is there anything additional the LSE needs to show to do this, such as including "remediation plan"?

a- Yes, this is acceptable. Please include both resources in your submission so we can see the new COD of the original resource. Please also indicate this is what you are doing in the notes.

b- Yes, please indicate in a brief remediation plan that you have procured an additional incremental resource to replace capacity that was delayed. Please also include the nature of the delay and revised COD for the original resource in your remediation plan.

37. If an LSE is selling capacity that is D.19-11-016 compliant that is both a new resource and an import – does the 10 year contracting requirement apply (new resources) or the 3 year contracting requirement apply (for imports)?

D.19-11-016 states that imports must be contracted for at least three years and does not distinguish between whether an import is new or existing.

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- 38. Can an LSE contract for portions of the year from different sellers and meet the requirement? For example, assuming the 3-year contract duration applies, could an LSE contract with Seller 1 for the first quarter of 2022, 2023, and 2024, and with Seller 2 for the rest of 2022, 2023, and 2024?**

D.19-11-016 requires a three-year contract duration for imported resources which requires the contract to be in place for 36 consecutive months. A contract that only runs from Jan-March for a three-year period would not comply. A project/ contract must comply individually – it cannot be combined with an additional project/ contract to meet the contract length requirement.

- 39. The Filing Requirements Overview indicates that compliance with Milestone #3 requires (1) a COD Notice; and (2) a highlighted master file with NQC. Can you clarify what is meant by "master file"?**

LSEs should include a COD notice if available to provide evidence of online status. If that is not available (i.e. in the case of an existing resource like Sutter), LSEs should provide where to find the resource on the CAISO Master Generating list.

Note: In review of our instructions, we have determined it is not necessary for LSEs to provide both documents, either will suffice.

- 40. *What should LSEs do for the resources that are not in the "resources" tab?**

If the resource name is not found on the "resources" tab, then please use one of the generic resources and provide the resource name in the column C (alternative_resource_name).

- 41. *For "storage_max_discharge" and "storage_depth_mwh" and "storage_duration_hours" should LSEs report just what we have under contract or the full rating of the unit?**

Please report what you have under contract.

- 42. *How should LSEs report "Unbundled REC" resources?**

Please enter 0 in the capacity and energy columns and leave the "buying_energy_capacity" field blank.

- 43. *Should LSEs include terminated contracts that were previously classified as Development or Planned New (in 9/1/2020 filing) and were subsequently terminated before COD?**

No. Please do not include those contracts.

- 44. *In the 2021 IRP Data Request Overview, Section 4, it states that "LSEs must include a crosswalk page with their submittal" when providing additional documentation to demonstrate that Milestones 1, 2, and 3 have been met. If an LSE submitted the**

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necessary documentation in its February 1 filing and has no new documentation to provide the CPUC, must a crosswalk table still be provided?

The crosswalk table is intended to help Staff sort through the supplemental documentation. If you do not have any additional documentation to submit, a table is not necessary.

45. *Should the contracts entered into the RDT file include only those that are relevant to the procurement order?

LSEs 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.

46. *Should we include RA contracts?

Yes

47. *Should we submit an RDT for both the 38MMT preferred conforming and 46MMT preferred conforming scenarios?

LSEs are required to provide contact information about the contractual status and development status of their individual electricity resources. 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). Thus, LSEs do not need to develop different portfolios.

48. *What is the requirement for LSEs with non-standard plan filings?

Those LSEs filing non-standard plans (and are not in the CAISO) don't need to file data on September 1.

49. *Are the LSE's who opted out of self-procuring for D.19-11-016, and therefore were exempt from the 2/1/2021 IRP backstop update filing, exempt from the 9/1/2021 filing?

Those LSEs still need to file updated IRP electricity procurement-related data for general procurement.

50. *Can you clarify if LSEs aren't required to provide any Milestone documents for Tranche 3 until Feb 1, 2023?

LSEs should submit all documentation they have available. If the documentation does not yet exist for a tranche 3 resource (i.e. notice to proceed has not been granted), it is not required. However, LSEs should still submit whatever progress has been achieved.

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

2021 IRP Data Request

Frequently Asked Questions

51. *The resources that we are reporting in the August 2 update have simplified or shorthand names that are sometimes used; should we be listing these under “alternative_resource_name”?

Yes. Please list them under “alternative_resource_name”.

52. *Regarding the “marginal_addition” please clarify if the LSE filing the report needs to report the expansion even if that expansion is not part of the contract that the LSE has entered into? Or if it is only to be reported if the expansion is adding on to the underlying contract?

Please report when the expansion is adding on to the underlying contract.

53. *Can you please confirm that if the “buy_or_sell” column is “N/A” unless the transfer/sale contract is with another LSE?

This is for when LSEs has buy/sell contract with another LSE or when the LSE is selling to a non-LSE. If the resource is being sold by the LSE to a non-LSE counterparty, select “non-LSE counterparty” from the drop down list for the special_counterparty.

54. *Is it correct that the “special_counterparty” column is only populated if the “buy_or_Sell” column is not “N/A”?

Yes

55. *Is the generator_supplier the same as the name of the developer of a contract that is not yet online and that it is the name of the owner of the resource for a resource that is online (which may or may not be the developer)?

Yes

56. *Is the “Notice_to_proceed” to be completed only for contracts meeting the requirements of D.19-11-016?

Yes. As the instruction says: “. If this project is not counted toward D.19-11-016, please leave this field blank”

57. *The instructions for using “N/A” are not clear for the “Signed_contract_between_lses_dr_import” cplumn. Can you please clarify when N/A is the correct selection for this column

Use N/A if you have answered yes or no (not NA) for the column: “signed_contract_new_construction”

58. *How is a “publicly announced contract” defined?

As long as the contract has been announced publicly in some way, please report it. If you think you need to add a note and/or more details, you can add those to the note column.

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

2021 IRP Data Request

Frequently Asked Questions

59. *Is there a need to include any new contracts for RA or RPS (or both) that have been executed since the IRP was originally filed in September of 2020?

Yes

60. *For RA-only contracts where LSEs have a set amount of capacity under contract, can they enter the capacity under contract in the special_resource_nameplate column?

Please use the contracted NQC columns or fraction of NQC columns to report the capacity under contract for RA only contracts. If LSEs do not have the nameplate value since there is no firm unit, please leave the "special_resource_nameplate" blank.

61. *Are LSEs required to include additional resource contract data beyond what we reported in our 2020 IRP?

Yes. LSEs need to include those resources. More information has been provided in the 2021 IRP Data Request Overview, section 3.B.

62. *Should LSEs report the planned resources that they had in their 2020 filings?

If those resources have been contracted since the 2020 filing, LSEs need to include them. Otherwise, no. 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.