

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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

Rulemaking 24-01-017
(Filed January 25, 2024)

**DRAFT 2025 RENEWABLES PORTFOLIO STANDARD
PROCUREMENT PLAN OF SAN DIEGO COMMUNITY POWER**

PUBLIC VERSION

Karin Burns
Chief Executive Officer
San Diego Community Power
P.O. Box 12716
San Diego, CA 92101
(619) 657-0060
kburns@sdcommunitypower.org

Dated: June 30, 2025

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In accordance with the California Public Utilities Commission’s (“Commission”) April 17, 2025 *Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2025 Renewables Portfolio Standard Procurement Plans* (“ACR”), San Diego Community Power (“SDCP”) hereby submits its Draft 2025 Renewables Portfolio Standard Procurement Plan (“RPS Procurement Plan”). This RPS Procurement Plan includes responses to the issues listed in sections 6.1-6.15 of the ACR.

SDCP notes that certain issues and requests in these ACR sections apply to other retail sellers (electrical corporations and electric service providers) and do not extend to Community Choice Aggregators (“CCAs”). SDCP is nevertheless voluntarily responding to these ACR sections in the interest of transparency and to collaborate with the Commission. The submission of this RPS Procurement Plan pursuant to the ACR, however, should not be construed as a waiver of the right to assert that components of Senate Bill (“SB”) 350, or Commission decisions and rulings on RPS Procurement Plan submittals, do not extend to CCAs, and SDCP reserves the right to challenge any such assertion of jurisdiction over these matters.

I. Summary of Major Changes to RPS Plan

This Section describes the most significant changes between SDCP’s Final 2024 RPS

Procurement Plan and its Draft 2025 RPS Procurement Plan. A redline of this Draft 2025 RPS Procurement Plan against SDCP's Final 2024 RPS Procurement Plan is included as Appendix A. The table below provides a list of key differences between SDCP's 2024 RPS Procurement Plan and 2025 RPS Procurement Plan:

Plan Reference	Plan Section	Summary/Justification of Change
RPS Procurement Plan: Section II	Executive Summary	Updated to reflect the changes made throughout other sections of this RPS Plan.
RPS Procurement Plan: Section IV.A.1	Long-Term Procurement	Updated with relevant supporting information on how SDCP's ongoing procurement efforts are expected to meet the requirements of SB 350's long-term contracting for Compliance Period 4 (2021-2024) and beyond.
RPS Procurement Plan: Section V	Project Development Status Update	Updated Appendix D to reflect the current status of SDCP's new-build renewable generating projects.
RPS Procurement Plan: Section VIII	Renewable Net Short Calculation	Updated Appendix C to reflect recent ongoing procurement efforts and prescribed changes to the planning period, which now extends through 2035.
RPS Procurement Plan: Section XIII	Cost Quantification	Updated Appendix E to reflect ongoing procurement efforts and prescribed changes to the planning period, which now extends through 2035.

SDCP timely commenced CCA service in March 2021 – such timing was consistent with information reflected in SDCP's Community Choice Aggregation Plan and Statement of Intent ("CCA Implementation Plan"), which was electronically served on all parties of record in proceedings R.17-09-020, R.16-02-007, and R.03-10-003 on December 9, 2019 and subsequently certified by the Commission on March 9, 2020. Customer phase-in activities were completed in 2023. Based on current load and customer forecasts, SDCP plans to serve more

than 957,171 service accounts located within the cities of Chula Vista, Encinitas, Imperial Beach, La Mesa, National City and San Diego as well as the unincorporated areas of San Diego County (together, the “Member Agencies”), which are expected to continue consuming approximately 8,000 GWh per year.

II. Executive Summary Key Issues

San Diego Community Power is a CCA program that commenced retail electric service in March 2021 to certain customers located within the cities of San Diego, Encinitas, La Mesa, Chula Vista, and Imperial Beach. SDCP was formed when these five Member Agencies created a Joint Powers Authority, effective October 1, 2019.¹ SDCP submitted its CCA Implementation Plan, which was certified by the Commission on March 9, 2020, to address the anticipated consequences of CCA formation.² Since it commenced service in March 2021, SDCP successfully completed planned phase-in activities, which have increased the number of customer accounts as well as related retail electric energy requirements. As reflected in Appendix C, actual retail electricity sales in 2021 approximated 2,047,877 MWh and increased by approximately 175% to 5,624,296 MWh in 2022. By the end of 2023, SDCP was serving nearly 940,000 customer accounts across all account classes. In November 2021, SDCP’s Governing Board approved submittal of Addendum No. 1 to the Community Choice Aggregation Implementation Plan and Statement of Intent to Address Expansion to the City of National City and the unincorporated areas of San Diego County (“Addendum No. 1”); Addendum No. 1 was subsequently submitted to the Commission on December 22, 2021 and

¹ See *Joint Powers Agreement*, San Diego Regional Community Choice Energy Authority, October 1, 2019, available at https://www.sandiego.gov/sites/default/files/sdrceea_jpa_agreement_signed_0.pdf.

² See *Letter Certifying San Diego Community Power’s Implementation Plan and Statement of Intent*, California Public Utilities Commission, March 9, 2020.

was also served to parties of record in proceedings R.03-10-003, R.20-05-003, R.19-11-009, and R.21-10-002 on that day. Addendum No. 1 was later certified by the CPUC's Energy Division on February 28, 2022. As the document's title suggests, Addendum No. 1 addressed the expansion of SDCP's service territory to include the noted municipalities with related customer service that commenced in April 2023. The increases in retail sales and related RPS purchases and procurement obligations associated with this expansion are reflected in SDCP's RPS planning and procurement processes, as well as in Appendix C of this Plan.

At launch, SDCP's governing board approved a procurement target for a minimum 50 percent renewable energy supply portfolio. Initially, SDCP offered its customer two retail service offerings: (1) "PowerOn" that had a minimum 50 percent renewable energy supply ramping up to 100% by 2035, and (2) "Power100" a 100 percent renewable retail service option available on a voluntary basis. In July 2024, SDCP began offering "Power100 Green+", a 100% renewable energy service offering that is supplied from Green-E certified resources, and "PowerBase", a lower renewable content product than "PowerOn" (but still above annual RPS compliance requirements) that provides customers with a more affordable option. Since SDCP is a relatively new CCA, and most of its long-term renewable energy contracts are not yet operational, PowerBase helped shield price-sensitive customers from the volatility of short-term renewable energy prices as Compliance Period 4 came to an end.

The minimum quantity of renewable energy delivered to SDCP customers is expected to increase over time, moving to 85% by 2030 and 100% by 2035, as reflected elsewhere in this document and its appendices. During its renewable energy procurement efforts, SDCP has focused exclusively on Portfolio Content Category ("PCC") 1 and 2 product types (with a

strong preference for PCC1 products).³ This considerable commitment to renewable energy procurement is expected to result in meaningful planning reserves, which will provide compliance buffers in the event that contracted renewable energy purchases are not fulfilled as expected – this topic is further discussed in relation to SDCP’s adopted voluntary margin of over-procurement (“VMoP”), which exceeds SDCP’s Minimum Margin of Procurement (“MMoP”). SDCP’s internally adopted renewable energy procurement goals provide a meaningful buffer above the state’s RPS requirements and serve as VMoP, which will exceed statewide RPS mandates by more than 10% of each year’s RPS requirement, in each year of the planning period, which now extends through 2034. Considered in concert, SDCP’s VMoP and MMoP provide a substantial aggregate renewable energy planning buffer, virtually eliminating the possibility of compliance shortfalls during continued SDCP operation.

SDCP also acknowledges that its renewable energy targets and related planning reserves could be periodically evaluated and adjusted by its governing board – such a determination could be based on: the manner in which actual renewable energy purchases/deliveries relate to applicable mandates and internally adopted targets; project development progress for new-build renewable generating facilities; generalized renewable product availability; the extent to which RPS deliveries under the Voluntary Auction – Market Offer (“VAMO”) allocations and contracts conform with related projections; load variability that may occur during customer enrollment periods; budgetary impacts; or various other considerations.

Reducing electric utility sector greenhouse gas (“GHG”) emissions generated by residents and businesses within SDCP’s Member Agencies was a driving factor in the formation

³ See *San Diego Community Power Community Choice Aggregation Implementation Plan and Statement of Intent*, December 9, 2019, available at <http://sdcommunitypower.org/resources/key-documents/>.

of SDCP. Climate Action Plans (“CAP”) adopted by SDCP’s Member Agencies establish a variety of GHG reduction and clean energy goals within their respective jurisdictions as detailed in Section IV.C.2(ii) (below). The Member Agencies intend to contribute to achieving their CAP goals collaboratively by operating SDCP to provide electric energy to residential, commercial, and governmental electric accounts located within their communities.

SDCP’s negotiation efforts have resulted in the execution of fourteen unique long-term PCC1 supply agreements thus far, which are described further in Section IV.A.1(iii).

SDCP issued long-term RPS solicitations in 2020, in the fourth quarter of 2022, in the first quarter of 2023, and in the fourth quarter of 2024 resulting in substantial interest from qualified suppliers of renewable products, as well as stand-alone storage projects. These solicitations led to many of the unique long-term PCC1 supply agreements listed above.

SDCP also completed bilateral negotiations of a long-term contract for bundled renewable energy supply from San Diego Gas & Electric (“SDG&E”), the incumbent IOU, and its portfolio of long-term renewable energy contracts. The unique structure of this contract allowed it to serve as a vehicle via which SDCP could purchase from SDG&E its elected allocation of bundled, long-term renewable energy; that is, the contract originally set a baseline annual volume of bundled, renewable deliveries between 2022 and 2033, which has since been adjusted to reflect SDCP’s allocation volume as determined through the VAMO mechanism. SDG&E filed the resulting contract for Commission approval in SDG&E AL 3936-E, which was subsequently received on May 19, 2022. This agreement meaningfully increased SDCP’s long-term PCC1 position in Compliance Period 4 (“CP4”, 2021-2024) and beyond. In addition, SDCP participated in the Long-term and Short-term Market Offer (“MO”) process of the three IOUs in 2023. SDCP was awarded a Long-term and a Short-term allocation of the remaining

Long-term Portfolios of both SDG&E and PG&E. Deliveries of long-term and short-term allocations of PG&E's Long-term portfolio began in 2023; Short-term deliveries of the Long-term portfolio from SDG&E's Market Offer began in 2023, while the long-term deliveries of the Long-term portfolio began in 2024.

To encourage local development of renewable energy and carbon-free energy storage projects and to inform upcoming solicitations by better understanding current opportunities for contracting such facilities, SDCP issued a Request for Information for Local Renewable Energy and Energy Storage ("Local RFI") in August 2021. The RFI was updated in early 2023 to extend the eligibility of commercial operation dates through 2027. The Local RFI is a rolling RFI accepting applications for review year-round. SDCP is evaluating proposals and negotiating power purchase agreements with multiple prospective long-term PCC1 suppliers. Because such contracting opportunities remain under negotiation and are confidential, SDCP is unable to further elaborate until these contracts have been finalized, approved and executed.

On October 25, 2023, SDCP released an RFO for distributed renewable energy resources (DERs) which focuses on a broad range of distribution-level renewable projects within San Diego County. SDCP staff have reviewed proposals, notified shortlisted participants, and are negotiating several contracts. One contract has been executed for a distributed energy solar resource.

To further encourage local development, SDCP is also implementing solicitations for the Disadvantaged Communities - Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT"). On September 29, 2021, SDCP filed its Tier 2 Advice Letter ("AL") with the Commission requesting a capacity transfer from SDG&E under the DAC-GT and CSGT based on the disadvantaged communities located within founding member agencies of SDCP. The

Commission accepted and approved SDCP's capacity transfer request on October 29, 2021.

SDCP submitted its implementation advice letter on October 12, 2022, seeking approval of the proposed programs and obtaining the status of a program administrator ("PA"). As part of the implementation advice letter, SDCP sought additional capacity transfer from disadvantaged communities located in National City, a new member city that was added to SDCP's joint powers authority ("JPA") after SDCP submitted AL 4-E.

On March 16, 2023, the California Public Utilities Commission ("CPUC") voted to adopt Resolution E-5246 on SDCP's DAC-GT and CSGT Implementation AL. As noted in the regulatory and legislative staff report for the February 2023 meeting of the Board of Directors Resolution approves SDCP's Tier 3 Implementation Advice Letter to become a PA of the DAC-GT and CSGT programs and the additional allocation of 15.78 MW for DAC-GT and 4.38 MW, adjusted for National City. SDCP did not include the General Cost Delta or 20% Bill Discount in the Program Year ("PY") 2023 to 2024 Budget Forecast, due to a lack of eligible interim resources. As a result, SDCP will auto-enroll customers when new projects come online, potentially as soon as 2027.

On May 19, 2023, SDCP submitted a Tier 2 AL 13-E, seeking CPUC approval for SDCP's DAC-GT and CSGT solicitation materials. The DAC-GT and CSGT solicitation documents include the Request for Offer (RFO) Protocol, Term Sheet, and the Generation Offer Form. The Commission approved the material in June 2023 and SDCP released the DAC-GT and CSGT solicitation documents on August 25, 2023.

SDCP expects to administer other solicitations for short- and long-term renewable energy supply, as well as other procurement activities, that will be necessary to meet its adopted portfolio objectives. Completed and upcoming renewable energy planning and procurement

activities administered by SDCP include the following:

1. COMPLETE – approval of SDCP’s Feed-In Tariff Program (“FIT”) was received and this program is now active. SDCP’s FIT program is expected to support situated, small-scale RPS-eligible renewable energy projects, which will marginally increase long-term PCC1 supply while supporting local economic development activity and workforce utilization. Additional detail regarding SDCP’s FIT program is available via the following link:
<https://sdcommunitypower.org/programs/feed-in-tariff/>;
2. COMPLETE – SDCP participated in the joint IOU Market-Offer process and was awarded short-term and long-term portions of SDG&E and PG&E’s Long-term Portfolio.
3. COMPLETE - SDCP released a targeted solicitation for long-term, new-build supply from “clean firm” renewable energy sources in Q2 2022, which SDCP staff expect to be fueled by geothermal or bioenergy renewable energy, to be online by 2026 to meet the relevant requirements within the CPUC’s Mid-Term Reliability (“MTR”) procurement order. The MTR order has now extended this target to 2028. SDCP launched another RFO for such resources in April 2025.
COMPLETE - SDCP released a targeted solicitation for long-term, new-build supply from “clean firm” renewable energy sources in Q2 2022, which SDCP staff expect to be fueled by geothermal or bioenergy renewable energy, to be online by 2026 to meet the relevant requirements within the CPUC’s Mid-Term Reliability (“MTR”) procurement order. The MTR order has now extended this target to 2028. SDCP launched another RFO for such resources in April 2025.

4. COMPLETE – SDCP released a 2022 RFP for Long-term California RPS-Eligible Energy in October 2022, for deliveries commencing prior to December 31, 2026. Four contracts have been executed to date from this RFP.
5. COMPLETE – SDCP released a 2023 Request for Proposals for Long-term California RPS-Eligible Renewable Energy in January 2023, for deliveries commencing prior to December 31, 2028. SDCP executed one PPA from this RFP.
6. COMPLETE - In May of 2023, SDCP issued a 2023 Request for Offers for Standalone Storage projects including long-term, new-build “long duration storage” capacity to be online by 2026/2028 to meet the relevant requirements within the CPUC’s Mid-Term Reliability (“MTR”) procurement order. SDCP has executed two ESSAs from this RFO solicitation.
7. Ongoing – SDCP issued a 2021 Request for Information for Local Renewable Energy and Energy Storage. The RFI was updated in October 2023 to extend the eligibility of commercial operation dates through 2027. The Local RFI is a rolling RFI accepting applications for review year-round. Being an ongoing solicitation, and receiving interest from numerous developers, SDCP is actively evaluating and negotiating these projects. SDCP has so far executed contracts with nine local battery storage facilities.
8. Ongoing - SDCP has administered short-term RPS solicitations to fill known open positions related to RPS products. Contracts have been executed with short-listed suppliers, and expected deliveries are now reflected in Appendix C of this Plan. SDCP will continue to administer solicitations for such products, as necessary,

and will update future planning documents to the extent such solicitations result in additional procurement;

9. COMPLETE - In August 2023, SDCP issued a 2023 Request for Offers for DAC-GT & CSGT projects. SDCP executed one PPA from this RFO.
10. COMPLETE – In October 2023 SDCP released an RFO for distributed renewable energy resources (“DERs”) which focuses on a broad range of distribution-level renewable projects within San Diego County.
11. COMPLETE – In August 2024, SDCP issued a 2024 Request for Proposals for Cluster 15 Interconnection Process Enhancements Commercial Interest Allocation (“Cluster 15 IPE RFP”). SDCP executed five exclusivity agreements for renewable and storage projects participating in CAISO’s Cluster 15 process to award commercial interest points. SDCP will engage in negotiations for these projects should they progress with interconnection and be awarded deliverability.
12. ONGOING – 2024 Long-Term RPS. SDCP has shortlisted projects and is actively engaged in negotiations.
13. COMPLETE – 2025 Clean Firm. No offers were received for any clean firm resources.

SDCP is also aware that renewable energy procurement activities must be timely completed to ensure the achievement of noted renewable energy targets, so it intends to continue such activities. These procurement efforts will be focused on securing necessary short-term and long-term renewable energy supply, the latter of which will be intended to facilitate compliance with California’s 65 percent long-term contracting requirement, which became effective in 2021. SDCP acknowledges that certain long-term renewable contracting opportunities may require

substantial lead time, particularly opportunities related to new-build renewable generating facilities. SDCP is aware that there may be lingering impacts of the pandemic on new-build renewable generating projects which may be heavily reliant on international supply chains to ensure timely completion. Additionally, transmission and interconnection upgrade delays across the state have impacted project timelines. There are challenges in determining the extent to which such effects will be experienced by SDCP and other buyers, but SDCP hopes to learn more by monitoring development progress of new renewable generating facilities that have been recently placed under contract. With time, SDCP remains optimistic that it will be able to facilitate a meaningful level of new renewable infrastructure buildout through its ongoing renewable energy contracting efforts and expects to confirm such expectations as it moves forward.

During administration of its ongoing renewable energy solicitation activities, SDCP will continue to gauge markets dynamics via responses from and discussion with prospective suppliers. SDCP's long-term bundled transactions with renewable developers and IOUs are necessary steps to secure such supply commitments as part of its resource planning and RPS compliance activities. SDCP is aware of potential repercussions associated with RPS compliance shortfalls and, with such concerns in mind, is committed to pursuing RPS contracting opportunities that will satisfy pertinent mandates, plus sufficient planning reserves.

As part of its ongoing planning process, SDCP is also considering the manner in which renewable energy compliance risks will be assessed and mitigated. One key element of this process included the adoption of a formal Energy Risk Management Policy ("ERM Policy")⁴, which occurred at the regularly scheduled meeting of SDCP's governing board on June 25, 2020.

⁴ See [San Diego Community Power Energy Risk Management Policy](#), June 25, 2020.

The ERM Policy addresses various types of risk and establishes related oversight in managing SDCP's various portfolio positions, control procedures, and delegations of authority related to the procurement of energy and capacity products. SDCP's ERM Policy also necessitates formation of a Risk Oversight Committee ("ROC"), which meets on a regular basis to monitor SDCP's procurement efforts, open positions, counterparty credit exposure and other concerns. Staff provides SDCP's ROC with various deal tracking and position reports to keep program management apprised of ongoing progress in meeting statewide compliance mandates and SDCP's internally adopted renewable planning targets, which exceed statewide mandates. The ROC also receives updates regarding the development progress of new-build renewable generating facilities that are expected to contribute to SDCP's RPS compliance mandates. In addition to the noted ERM Policy and ROC, SDCP's Chief Commercial Officer oversees the day-to-day management of resource planning, power supply acquisition, and related compliance activities and ensures ongoing coordination with SDCP's suppliers.

In order to ensure RPS compliance, especially during early stages of CCA formation, SDCP considers it crucial to identify and select highly experienced and financially viable sellers during the administration of renewable energy solicitation processes. This understanding is supported by conversations with leadership of longer-standing California CCAs, which emphasized the importance of such an approach during renewable energy procurement efforts; such CCAs noted that the timing of early-stage RPS planning and procurement efforts (and the proximity of such efforts relative to imposition of the 65 percent long-term contracting mandate) necessitated considerable reliance on: 1) existing renewable generating facilities; and/or 2) highly experienced project developers with strong track records of timely project completion. At this time, SDCP's contracting efforts have reduced, if not eliminated, any compliance shortfall

risk. The remaining RPS-related risk to SDCP is only related to additional voluntary RPS procurement targets. SDCP remains confident that current renewable energy open positions, only those related to the voluntary procurement targets, will be significantly reduced in the near future. Given SDCP's gross RPS procurement needs and existing procurement efforts, a quantitative risk assessment was recently completed by SDCP. The results of such assessment are presented below, including a description of the methodology used to complete it. As SDCP continues to update its risk assessment based on future contracting efforts and its impressions of various sources of RPS delivery risk, it will elaborate on its findings in future RPS Procurement Plans.

SDCP will carefully monitor the performance of selected renewable energy suppliers relative to projected RPS requirements and will augment procurement efforts in the event that actual renewable deliveries fall below projections. Based on SDCP's minimum 50 percent renewable procurement target, the organization could suffer significant delivery shortfalls while still satisfying statewide compliance mandates.

III. Compliance with Recent Legislation and Impact of Regulatory Changes

This RPS Procurement Plan addresses the requirements of all relevant legislation and the Commission's regulatory framework. This Section describes the relevant statutory and regulatory requirements and how this RPS Procurement Plan demonstrates that SDCP will meet such requirements.

Senate Bill ("SB") 350 (stats. 2015) was signed by the Governor on October 7, 2015. SB 350 set a new RPS procurement target of 50 percent by December 31, 2030. On December 20, 2016, the Commission issued D.16-12-040, which partially implemented the increased targets of SB 350 by establishing new compliance periods and procurement quantity requirements. On July 5, 2017, the Commission issued D.17-06-026, which implemented some of the key

remaining elements of SB 350, including adopting new minimum procurement requirements for long-term contracts and owned resources, as well as revising the excess procurement rules.

SB 100 was signed by the Governor on September 10, 2018, and became effective on January 1, 2019. SB 100 increased the RPS procurement requirements to 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. On June 6, 2018, the Commission issued D.18-05-026, which implemented changes made by SB 350 to the RPS waiver process and reaffirmed the existing RPS penalty scheme. In July of 2018, the Commission instituted Rulemaking 18-07-003 to continue the implementation of the RPS program. On June 28, 2019, the Commission issued D.19-06-023, which continues to use a straight-line method to calculate compliance period procurement quantity requirements.

The current RPS procurement targets are incorporated into SDCP's Renewable Net Short Calculation Table as described in Section VIII below, and attached as Appendix C. SDCP's planned procurement, as reflected in SDCP's Renewable Net Short Calculation Table and described in Sections IV and V, is expected to exceed pertinent RPS procurement mandates, including a minimum margin of over-procurement based on SDCP's risk assessment, as further described in Sections VII and IX. SDCP also expects to meet California's SB 350 long-term procurement requirement, as described in Sections V and VII.

SB 901, signed by Governor Brown on September 21, 2018, added Public Utilities Code section 8388, which requires any IOU, publicly owned electric utility, or CCA with a biomass contract meeting certain requirements to seek to amend the contract to extend the expiration date to be five years later than the expiration date that was operative as of 2018. SDCP does not have a contract with a biomass facility that is covered by Public Utilities Code section 8388.

SB 255 (stats. 2020, ch. 407) amended Public Utilities Code § 366.2 to require certain CCAs to

annually submit to the Commission the following: (i) a plan for “increasing procurement from small, local, and diverse business enterprises in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects,” and (ii) a report regarding the CCA’s “procurement from women, minority, disabled veteran, and LGBT business enterprises in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects.” SDCP’s compliance with SB 255 is described in Section X.B below.

Assembly Bill (“AB”) 843, signed by the Governor on September 23, 2021, authorizes CCAs to participate in the Bioenergy Market Adjusting Tariff (“BioMAT”) program if capacity is available under the program cap. SDCP does not have any immediate plans to participate in the BioMAT but may reevaluate this decision as part of its future planning for additional renewable procurement, which may also focus on biomass or biofuel resources outside of the BioMAT program.

SB 1020, referred to as “Clean Energy, Jobs, and Affordability Action of 2022,” sets a statewide goal of one hundred percent zero-carbon electricity by 2045. SB 1020 also directed every state agency to ensure that zero carbon resources and eligible renewable energy resources supply one hundred percent of the electricity procured on its behalf by 2035. These state agencies are specifically directed to meet this 2035 target through any or all of the following options: (i) installing behind the meter resources, (ii) procuring zero-carbon or eligible renewable energy resources through the POU, IOU, CCA, or ESP that is providing retail service to that state agency, or (iii) participating in a qualifying voluntary shared renewable or green pricing program. SDCP is in the early stages of identifying and coordinating with any state agency customers regarding their planned compliance with SB 1020. SDCP does not see any impacts on RPS procurement planning due to SB 1020 as SDCP’s internal targets are to serve 100%

renewable (and thus carbon free) energy by 2035.

SDCP is closely tracking federal legislation relating to clean energy tax credits. Congress is expected to send the President budget reconciliation legislation that would extend the 2017 Tax Cuts and Jobs Act. Congress will need to make corresponding budget cuts to pay for the Tax Act extension. One means of creating savings is to reduce or eliminate federal energy tax credits that support the transition to clean energy. Current law, as enacted by the Inflation Reduction Act of 2022, provides a 30% tax credit for utility scale clean energy projects. Both the House of Representatives and Congress have proposed budget reconciliation plans.

House of Representatives H.R.1, referred to as the “One Big Beautiful Bill Act,” is the budget reconciliation legislation approved by the House on May 22, 2025. H.R.1 will potentially affect the following energy tax credit issues:

- Eliminate the New Clean Vehicle Tax Credit, the 30% residential and storage credit (“RCEC”) and the home energy efficiency and electrification upgrade (“HEEIC”) tax credit;
- Phase out the Investment Tax Credit (“ITC”) and the Production Tax Credit (“PTC”) for all utility-scale technologies by the end of 2028. Projects would have to either start construction within 60 days of the bill’s enactment or be placed into service by December 31, 2028, to qualify; and
- Impose restrictive foreign entities of concern (“FEOC”) conditions on projects seeking ITC and PTC benefits in such a manner that energy facilities could not receive any material assistance from foreign controlled or influenced entities, including the component parts of facilities. This largely means that any energy project with any parts from China, or a company with ties to China, would not be

eligible. This would go into effect on December 31, 2025.

The Senate Finance Committee released their approach to budget reconciliation on June 16, 2025, which will likely have the following effects on energy tax credits:

- Eliminate the New Clean Vehicle, RCEC and the HEEIC tax credits;
- Phase out the ITC and PTC differently depending on technology:
 - For wind and solar: limit the credits to 60% of their value for facilities that begin construction in 2026 and 20% of the credit value for facilities that begin construction in 2027. There would be no credit in years thereafter;
 - For other clean energy technologies: 100% through 2033, then 75% in 2034, 50% in 2035, and 0% starting in 2036; and
- Impose complex FEOC restrictions to all clean energy technologies.

The final outcome of the proposed modifications to the clean energy tax credits is still unclear, as there are several steps left in the Congressional process. Approximately two-thirds of SDCP's forecasted renewable energy volume under development in our contracted portfolio is from either projects under construction or those having met the construction start safe harbor provisions (i.e. meeting a 5% threshold of capital investment delivered or stored). Those projects are not anticipated to be affected by modifications to the rules on tax credit eligibility, whether under H.R. 1 or the bill proposed by the Senate Finance Committee.

With respect to SDCP's contracted energy storage projects, the Senate's version of the bill appears to explicitly allow energy storage assets to capture the full ITC with the initial reduction not occurring until 2034, and be safe harbored from the FEOC restrictions if the project had a contract before June 16 of 2025. However, the Senate's FEOC restrictions would likely have a material impact on the eligibility of the ITC for those projects not having a contract

at this time. SDCP is investigating to what extent the FEOC composition ratio thresholds (e.g. 50% in 2026) under the Senate’s version can be met with currently anticipated supply chains for battery energy storage and other technologies. Regardless of technology, it is too soon to draw conclusions on the likely impacts to project costs and viability under any new tax credit.

On January 20, 2025, President Trump released the Unleashing American Energy Executive Order (“EO”) revoking the previous EO #14008, which allowed the Bureau of Land Management (“BLM”) to prioritize permitting of renewable energy on federal lands. Concurrently, the Department of Interior, which oversees BLM, issued a 60day pause authorizing any renewable energy projects. SDCP has learned that the permitting pause – for solar at least – is no longer in effect and projects are still being approved. However, BLM may not be approving the projects at an expeditious rate given the Administration’s priority permitting focus on traditional energy projects. As a potential positive sign, the BLM recently announced approval of a solar project in Arizona.

SDCP has a PPA for a large solar photovoltaic and battery project, Purple Sage, which is largely sited on BLM land. In May, SDCP’s Board of Directors approved an amendment to this PPA that extends the guaranteed commercial operation date by a year into 2028. SDCP will continue to monitor progress made on project permitting and development as it relates to Purple Sage and potential future projects on federal lands.

IV. Assessment of RPS Portfolio Supplies and Demand

IV.A. Portfolio Supply and Demand

(i) Assessment of Portfolio Supply and Demand through 2035

As previously noted, SDCP successfully initiated customer service in March 2021. As of end-of-year 2024 SDCP is serving over 950,000 accounts, which are expected to consume over 8,000 GWh per year. SDCP has now executed fourteen long-term PCC1 supply contracts that

will result in the delivery of approximately 3,043 GWh per year following the successful commercial operation of the renewable generating projects. Further, SDCP's election of long-term PCC1 and PCC0 supply contracts via VAMO allocations will result in the delivery of over 2,800 GWh per year. Of the new-build projects not yet online, seven projects will utilize photovoltaic solar generating technology combined with battery storage to allow for re-shaping of project energy and one will utilize wind technology.

Additional contracting efforts remain in process with additional solicitations scheduled in the future. Following the completion of negotiation activities associated with any long-term renewable supply agreement, the final contract(s) will be brought before SDCP's governing board for approval and, if approved, will be executed thereafter. Short-term renewable supply agreements may be executed by SDCP's Chief Executive Officer pursuant to delegated contracting authorities – the limitations associated with such contracting authorities are reflected in SDCP's Energy Risk Management Policy.

The ongoing examination of customer electricity usage and other market developments should help reduce costs and assist in meeting planned procurement for the period reflected in this RPS Procurement Plan. SDCP notes that understanding customer electricity usage may be more challenging than usual during the implementation of fiscal policy changes intended to curb inflation (via phased interest rate increases) that may impose recessionary pressures on the economy. If recessionary markers start to surface, including reduced spending, business closures, constrained access to credit, etc., SDCP will attempt to evaluate the extent to which future customer energy usage may be affected. Regarding demand side impacts, these are often more challenging to isolate, as normal variations in usage caused by weather may obscure otherwise atypical variations in consumption. For renewable energy planning purposes, SDCP's

primary retail sales forecast adjustments have been related to expected customer enrollments, without noteworthy adjustments related to these circumstances. To the extent that retail sales fall below SDCP's expectations, it is likely that renewable energy content will be higher than necessary to promote achievement of programmatic goals. In such cases, SDCP expects that it could: 1) sell excess renewable energy supply to interested buyers, thereby rebalancing its portfolio to align with desired renewable energy targets; 2) retain excess renewable energy supply, providing customers with higher-than-promised renewable energy supply; or 3) explore other options that may be available under California's RPS program to utilize excess volumes in another calendar year or compliance period. Such decisions will be made following consultation with SDCP's governing board, staff, and technical advisors.

SDCP is also attempting to gain an improved understanding of the prospective impacts to its customer base associated with the potential reopening of California's direct access market due to SB 237 (2018) and D.19-05-043. In D.21-06-033, the Commission recommended against expanding direct access at this point, however, SDCP recognizes that this may change in the future. As such, SDCP will monitor the proceeding to determine potential impacts to its planning process. To the extent that SDCP load migrates to direct access providers, its retail sales would likely fall – in theory, such a change would increase SDCP's proportionate renewable energy content unless surplus supply was sold to other market participants; this would be similar to the impacts experienced by California's IOUs, which have resulted from ongoing CCA implementations and expansions – following these activities, the proportionate RPS content of each IOU has increased, as evidenced in the annual Power Source Disclosure Report of each IOU (for reference, this has occurred in spite of IOU-administered solicitations intended to sell off surplus RPS supply, which suggests that other retail sellers, particularly

CCAs, have already made meaningful progress in meeting applicable RPS mandates in the near-term planning horizon). To the extent that any direct access-related adjustments are incorporated in SDCP's RPS planning processes, it will reflect them in a subsequent RPS Procurement Plan. Through the ongoing evaluation of customer demand and other market developments, SDCP hopes to promote reduced overall costs while meeting planned procurement objectives for the period addressed in this RPS Procurement Plan.

(ii) Assessment of Need for RPS Resources with Specific Deliverability Characteristics

SDCP has a goal of assembling a diversified renewable energy supply portfolio that will deliver energy in a profile that is generally consistent with SDCP's anticipated load shape – SDCP's growing portfolio of renewable supply commitments will be increasingly considerate of load/resource balances and will attempt to promote such balance to the greatest practical extent. SDCP utilizes a portfolio risk management approach as part of its power purchasing program, seeking low-cost supply (based on then-current market conditions) as well as diversity among technologies, production profiles, project sizes and locations, counterparties, lengths of contract, and timing of market purchases. Currently, SDCP is focused on adding resources such as geothermal and wind to its portfolio to complement its expansive solar photovoltaic and 4-hour battery portfolio. Such resources will add overnight deliveries to help balance SDCP's delivery profile.

In carrying out its planning functions, SDCP will also consider the deliverability characteristics of its future generating resources placed under contract (such as the resource's dispatchability, available capacity, and typical production patterns) and will review the respective risks associated with short- and long-term purchases as part of its forecasting and procurement processes. The lack of deliverability, especially in its local region, provides risks

and challenges that need to be considered in effective procurement and portfolio planning. Current backlogs place risk on project viability as even projects with deliverability status can have their net qualifying capacity cut for up to 10 years by CAISO, placing risk on revenues to the project or putting that risk on LSEs such as SDCP.

To date, in pursuit of a balanced portfolio that ensures reliable renewable energy supply, SDCP has contracted with seven solar resources which are hybridized or co-located with battery storage, two wind generating facilities which have generation profiles that are complementary to the solar and in-state wind generation shapes, and is actively negotiating with or soliciting offers for additional renewable resources paired with storage, stand-alone storage facilities, and “clean firm” renewable resources. Going forward, SDCP will continue to balance these competing portfolio management interests to support reasonably close alignment between supply and demand (reducing the need for pronounced resource ramping on the system), cost-effective procurement and overall grid reliability.

Please See IV.B(i) for more detailed analysis.

(iii) Experience Managing Exposure to Negative Market Prices

Please see section IV.B.2(c).

(iv) Assessment of how the Renewable Net Short Quantitative Analysis Supports the Assessment of Portfolio Supply and Demand

Due to SDCP’s successful procurement efforts to date, it is now accruing renewable energy quantities in excess of applicable statewide mandates. SDCP will effectively ensure its compliance with applicable RPS mandates by procuring in consideration of internal renewable energy goals that meaningfully exceed state-adopted requirements. SDCP currently provides a minimum 50% renewable energy content target to most customers as part of its default retail service offering, PowerOn. SDCP’s governing board may periodically consider increases to

such renewable energy content for purposes of ensuring that SDCP differentiates its supply portfolio from applicable state-mandated renewable content. The extent to which SDCP will exceed statewide RPS mandates upon a variety of factors, including RPS product availability, product cost and budgetary impacts and timely product deliveries from generating facilities under contract with SDCP. As SDCP's governing board considers and adopts changes to its internal renewable energy procurement targets, the organization will accordingly update future RPS planning documents to reflect such changes. In Summary, the Renewable Net Short Analysis in Section VIII supports SDCP assessment that it will have enough supply through all compliance periods to meet the state minimum RPS requirements.

(v) How Procurement, Allocations, or Sales Planned for the Period Covered by the 2025 RPS Plan is Consistent with the Evaluation of Supply and Demand

For the period covered by this 2025 RPS Plan, SDCP expects to continue meeting pertinent RPS compliance obligations by entering into a variety of renewable energy supply agreements of varying term lengths and structures. The exact portfolio characteristics selected may vary depending on direction received from SDCP's governing board, renewable resource availability, procurement costs, legislative and policy changes, technological improvements, principles of resource diversity, preferences of the Member Agencies, and other developments. To manage this future uncertainty, SDCP will regularly evaluate anticipated supply requirements in consideration of expected customer electricity usage and anticipated renewable energy deliveries; such information is expected to influence future procurement efforts, which will attempt to balance customer usage with requisite resource commitments. SDCP is also aware of the need to promote the use of a diverse renewable resource portfolio, avoiding overcommitting to certain generating technologies, suppliers, geographic regions, etc. For now, the organization must remain open minded and considerate of all possible supply options. SDCP must also

proceed with its RPS planning and procurement activities under a “compliance first” mindset with the primary goal of securing necessary RPS supply from available generating sources – because financial penalties related to compliance shortfalls under the RPS program are not waived or reduced in consideration of portfolio characteristics (such as technology and/or geographic diversity). It is advisable for new retail sellers, including SDCP, to primarily focus on securing requisite volumes, even if the majority of such volumes happen to be associated with a specific technology type or geographic region. This noted, SDCP will continue to make reasonable efforts to promote resource diversity during its renewable energy planning and procurement processes, and if such processes do not result in the desired level of resource diversity, SDCP will craft future solicitations to promote renewable energy portfolio diversity. For now, SDCP has successfully secured renewable energy deliveries that utilize wind, solar, and “solar plus battery storage,” the last of which will allow SDCP to reshape typical solar production to better align with customer energy use and market price signals.

IV.A.1. Long-Term Procurement

(i) Assessment of How Current and Planned Procurement Meets 65 Percent Long-Term Contracting Procurement Requirement Through 2035.

Pursuant to Public Utilities Code section 399.13(b), from 2021 onwards, 65 percent of mandated renewable energy purchases must be sourced from contracts of 10 years or more.⁵ Currently, SDCP has covered at least 65 percent of the mandated renewable energy purchases through long-term contracts over 10 years. Beyond 2030, this percent approaches 100 percent.

⁵ Cal. Pub. Util. Code § 399.13(b)(1) (“A retail seller may enter into a combination of long- and short-term contracts for electricity and associated renewable energy credits. Beginning January 1, 2021, at least 65 percent of the procurement a retail seller counts toward the renewables portfolio standard requirement of each compliance period shall be from its contracts of 10 years or more in duration or in its ownership or ownership agreements for eligible renewable energy resources.”).

(ii) *Quantitative Assessment of Long Term RPS Position*

This anticipated trajectory, which includes certain of SDCP's long-term VAMO allocation elections, is reflected in the following table.

	<i>CP4</i>	<i>CP5</i>	<i>CP6</i>
	<i>2021-2024</i>	<i>2025-2027</i>	<i>2028-2030</i>
<i>SDCP Retail Sale - MWh</i>	22,772,971	██████████	24,307,970
<i>State Mandated RPS Target - % of Retail Sales</i>	41.0%	██████████	57.33%
<i>SDCP State Mandated RPS Target- MWh</i>	9,338,984	██████████	13,938,723
<i>State Mandated 65% Long-Term Contracting Target - MWh</i>	6,070,340	██████████	9,060,170
<i>SDCP Long-term Procurement Achieved – MWh</i>	8,129,829	██████████	21,638,822
<i>SDCP Long-term Procurement Achieved - %</i>	134%	██████████	239%

As reflected in the previous table, SDCP exceeded applicable long-term RPS procurement mandates in Compliance Period 4. More specifically, for Compliance Period 4, SDCP procure in excess of 134% of its required long-term RPS mandate (which means that SDCP procure 87% of total statutorily mandated RPS purchases from long-term contracts), based on long-term RPS deliveries of over 8,100GWh, relative to a long-term procurement obligation of about 6,000 GWh. Similarly, in Compliance Period 5, which includes calendar years 2025 through 2027, SDCP also expects to procure in excess of ██████████ of its required long-term RPS mandate (which means that SDCP again expects to procure greater than ██████████ of total statutorily mandated RPS purchases from long-term contracts), based on expected long-term RPS deliveries of over ██████████, relative to a projected long-term procurement obligation of approximately ██████████. In Compliance Period 6, which includes calendar years 2028 through 2030, SDCP expects to procure about 239% of its required long-term RPS mandate

(which means that SDCP again expects to procure approximately 155% of total statutorily mandated RPS purchases from long-term contracts), based on expected long-term RPS deliveries of approximately 21,600 GWh, relative to a projected long-term procurement obligation of approximately 9,000 GWh.

These projections are based on estimated annual deliveries to be received under SDCP's long-term VAMO supply agreement with SDG&E, which was executed on December 20, 2021. SDCP has also accepted long-term MO award volumes that will contribute to these compliance periods, as well contracting for new build renewable development projects. The delivery estimates account for the contribution of SDCP's VAMO supply, and SDCP believes it would successfully achieve compliance with long-term RPS procurement mandates through 2030 under a variety of adverse scenarios in which severe delivery shortfalls could occur. Even with long-term RPS deliveries expected to meaningfully exceed applicable mandates, SDCP expects to continue the selective pursuit of additional long-term RPS contracting opportunities via independently administered solicitations and bilateral contracting discussions. Future long-term RPS contracting efforts are likely to focus on diversifying SDCP's RPS supply portfolio and may include additional hybrid generating configurations, baseload renewable generating technologies, and emerging renewable generating technologies that would be expected to promote budgetary certainty and grid reliability.

(iii) Summary of Current and Planned Long-Term RPS Procurement

SDCP has been conscientiously pursuing contracting opportunities to meet this requirement and has now entered into fourteen unique long-term PCC1 supply agreements (VAMO, two Market Offers, ten PPAs, one cluster of local distributed energy projects), which include:

- 1) a long-term (20-year) PCC1 supply agreement with Vikings Energy Farm, LLC,

executed on May 3, 2021, which will cause the delivery of approximately 250,000 MWh per year of renewable energy produced by a new 136.8 megawatt photovoltaic solar array (plus battery storage) located in Imperial County that commenced commercial operation in August 2024;

2) a long-term (20-year) PCC1 supply agreement with JVR Energy Park, LLC, executed on June 4, 2021, which will cause the delivery of approximately 260,000 MWh per year of renewable energy produced by a new 90 megawatt photovoltaic solar array (plus battery storage) located in San Diego County that is expected to commence commercial operation in October 2026;

3) a long-term (15-year) PCC1 supply agreement with IP Oberon, LLC, executed on June 11, 2021, which will cause the delivery of approximately 225,000 MWh per year of renewable energy produced by a new 75 megawatt photovoltaic solar array located in Riverside County that commenced commercial operation in July 2023;

4) a long-term (10-year) PCC1 supply agreement with Duran Mesa LLC, executed January 27, 2022, which will cause the delivery of approximately 170,000 MWh per year of renewable energy produced by 50 MW of new wind capacity located in Torrance County, New Mexico that achieved commercial operation (on November 30, 2021, as reflected in the California Energy Commission's associated certificate for this project) and began delivering power to SDCP on February 1, 2022;

5) a long-term (5-year) PCC1 supply agreement with Pacific Gas and Electric Company, executed on September 30, 2022, for an existing 29 megawatt biomass renewable generation facility located in Burney, CA that is online;

6) a long-term (20-year) PCC1 supply agreement with Orni 30 LLC, executed on June

29, 2023, for a new 42 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Imperial County that is expected to commence commercial operation in October/November 2025;

7) a long-term (20-year) PCC1 supply agreement with Yellow Pine Solar III, LLC, executed on July 3, 2023, for a new 35 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in June 2027;

8) a long-term (20-year) PCC1 supply agreement with Vidal Solar, LLC, executed on Jan 2, 2024, for a new 160 megawatt photovoltaic solar array (plus 160 MW battery storage) located in San Bernardino county that is expected to commence commercial operation in December 2026;

9) a long-term (15-year) PCC1 supply agreement with SunZia Wind PowerCo LLC, executed on November 7, 2023, for a new 150 megawatt wind generation facility located in New Mexico that is expected to commence commercial operation in March 2026;

10) a long-term (15-year) PCC1 supply agreement with Pelicans Jaw Solar, LLC, executed on May 1, 2024, for a new 440 megawatt photovoltaic solar array (plus 238.5 MW battery storage) located in Kern county that is expected to commence commercial operation in September 2026;

11) a long-term (20-year) PCC1 supply agreement with Nobel Solar, LLC, executed on March 15, 2024, for a new 400 megawatt photovoltaic solar array (plus 400 MW battery storage) located in Clark county, Nevada that is expected to commence commercial operation in January 2029;

12) a long-term (20-year) PCC1 Market Offer award with PG&E (deliveries from 2023-

2043);

13) a long-term (17-year) PCC1 Market Offer award with SDG&E (deliveries from 2023-2040); and

14) multiple long-term (20 year) contracts with a local developer on a group of distributed energy storage and solar battery storage projects in San Diego County, totaling 5.49 MW of solar (plus 20.57 MW storage capacity).

Note that of the aforementioned projects, Duran Mesa, IP Operon, and Vikings have achieved commercial operation, and the noted agreements with SDG&E (VAMO and MO) and PG&E (MO) will be exclusively supplied from existing/operational projects, which serves to de-risk a significant portion of SDCP's upcoming long-term RPS deliveries. SDCP's expansion activities in 2022 and 2023 necessitated its acceptance of certain long-term allocations available under VAMO to ensure compliance with applicable long-term contracting requirements during CP4 and beyond. It is worth noting that SDCP intends to continue focusing the significant majority of its PCC1 contracting efforts on contract durations of ten years or longer, which should contribute to the accrual of a planning reserve over time, alleviating concerns regarding long-term contract compliance.

(iv) Timeline Meeting 65 Percent Long Term Procurement Requirement.

SDCP has already executed enough contracts to meet the 65 percent long-term contracting requirement.

IV.B Portfolio Diversity and Reliability

(i) Description of How Portfolio Diversity is Considered.

Power purchased from power marketers, public agencies, generators, CCAs, or utilities will be a source of supply for SDCP's operation. Based on current contracting efforts, SDCP expects to obtain requisite electricity supply from several suppliers, including power marketers,

project developers, and/or IOUs. Such suppliers will be responsible for delivering a portion of SDCP's intended resource mix, including SDCP's desired quantities of renewable and carbon-free energy, to provide a stable and cost-effective resource portfolio.⁶

In carrying out its planning functions, SDCP will also consider the deliverability characteristics of its future generating resources placed under contract (such as the resource's dispatchability, available capacity, and typical production patterns) and will review the respective risks associated with short- and long-term purchases as part of its forecasting and procurement processes. These efforts should lead to a more diverse resource mix, address grid integration issues, and provide value to the Member Agencies. The lack of deliverability, especially in its local region, provides risks and challenges that need to be considered in effective procurement and portfolio planning. Current backlogs place risk on project viability as even projects with deliverability status can have their net qualifying capacity cut for up to 10 years by CAISO, placing risk on revenues from the project or putting that risk on LSEs such as SDCP.

SDCP utilizes a portfolio risk management approach as part of its power purchasing program, seeking low-cost supply (based on then-current market conditions) as well as diversity among technologies, production profiles, project sizes and locations, counterparties, lengths of contract, and timing of market purchases. SDCP currently utilizes portfolio management tools, including a platform with cQuant Advanced Analytics which, among other analyses, calculates volume at risk due to resource intermittency, curtailment and outages. For projects not yet operational, SDCP conducts regular project-specific scenario analysis to account a range of potential risks to project delays.

⁶ See *San Diego Community Power Community Choice Aggregation Implementation Plan and Statement of Intent*, December 9, 2019, p.1 at 6.6, available at <http://sdcommunitypower.org/resources/key-documents/>.

SDCP will procure renewable and other requisite energy products, as necessary, to ensure that the future energy needs of its customers are met in a reliable and cost-effective manner, consistent with applicable compliance mandates. SDCP, through its CCA Implementation Plan and subsequent planning discussions, has established initial procurement targets for requisite renewable energy supply, including subcategories for various renewable energy products, and has also established targets for related planning reserves as described elsewhere in this document. To the extent that SDCP's energy needs are not fulfilled through the use of renewable generating resources, it should be assumed that such supply will be sourced from carbon-free and/or conventional energy resources, such as hydroelectric or natural gas generating technologies, as well as system power purchases.

A key component of SDCP's planning process relates to the analysis and consideration of expected load obligations with the objective of closely balancing supply and demand, rate stability, and overall budgetary impacts. This process primarily focuses on the compilation and analysis of historical customer data, as provided by SDG&E, identification of any ineligible or excluded accounts (that will not be enrolled in CCA service), and related refinements to SDCP's retail sales forecasts. Similar to most CCAs, SDCP expects that such historical data will not be a perfect predictor of future customer energy requirements, so it intends to actively monitor actual customer usage over time, refining such forecasts as well as its ability to minimize variances between procured energy quantities and actual usage. SDCP also plans to maintain portfolio coverage targets of up to 100 percent (of expected customer energy requirements) in the near-term (0 to 2 years) but will leave larger open positions in the mid- to long-term, consistent with generally accepted industry practices.

As mentioned, SDCP is focused on adding resources such as geothermal and wind to its

portfolio to complement its expansive solar photovoltaic and 4-hour battery portfolio. Such resources will add overnight deliveries to help balance SDCP's delivery profile to be consistent with SDCP's anticipated load shape. In addition, and for purposes of promoting better alignment of customer energy usage and expected energy deliveries, SDCP has invested heavily in both stand-alone storage and hybrid or co-located storage and renewable energy projects with over 1.5 GW of battery energy storage to be developed in the next four years.

To more closely align SDCP's resource portfolio with the evolving energy requirements of its member communities, SDCP anticipates that a diverse set of renewable resources will be necessary, including the strategic inclusion of generating resources, energy storage resources, and complementary infrastructure that may allow SDCP to dispatch/shape such supply in consideration of evolving customer energy needs and usage patterns.

(ii) Description of How Planned RPS Portfolio Diversity will Contribute to System Reliability.

With respect to system reliability, SDCP is aware of the need to pursue a portfolio of renewable resources with diverse and complementary delivery profiles as well as complimentary infrastructure (namely, energy storage infrastructure) that will support the reshaping of renewable energy deliveries to better align with load. SDCP considers its overall portfolio and system requirements, including expected load curves and duration, in its procurement efforts. For example, renewable energy procurement efforts that may initially focus on relatively low-cost solar resources will often necessitate subsequent investments in co-located energy storage infrastructure or higher-cost baseload renewable generating technologies, such as those using geothermal, biomass and landfill gas fuel sources. These baseload renewable technologies are often priced at three-to-four times the level of in-state photovoltaic solar generation but generally provide increased capacity value (due to the more

predictable, baseload generating profiles of such resources) and related reliability enhancements.

To date, in pursuit of a balanced portfolio that ensures reliable renewable energy supply, SDCP has contracted with seven solar resources which are hybridized or co-located with battery storage, two wind generating facilities which have generation profiles that are complementary to the solar and in-state wind generation shapes, and is actively negotiating with or soliciting offers for additional local hybrid renewable resources, stand-alone storage facilities, and “clean firm” renewable resources. Going forward, SDCP will continue to balance these competing portfolio management interests to support reasonably close alignment between supply and demand (reducing the need for pronounced resource ramping on the system), cost-effective procurement and overall grid reliability. SDCP remains committed to pursuing a conscientious planning process that balances grid reliability, compliance demonstration and customer cost impacts. SDCP is willing to engage in discussions with SDG&E and the California Independent System Operator regarding reliability and other system impacts related to its portfolio. SDCP is further willing to consider the feedback provided by the organizations in its planning and procurement processes going forward, so long as such suggestions generally conform with organizational objectives and Board-adopted policies.

SDCP’s procurement efforts have mitigated any negative system impacts through its Risk Oversight Committee (“ROC”), which meets on a regular basis to discuss any potential risks to the portfolio. Staff updates the ROC with any issues they have identified, ensuring that the different teams within SDCP are aligned on the procurement plan to prioritize system needs and customer satisfaction. SDCP vets each contract to ensure that any foreseeable risks are considered before contract execution and also maintains excellent working relationships with

developers to ensure that any unforeseen changes are resolved in good faith to ensure the viability of projects to the extent possible.

SDCP's portfolio addresses the issues of renewable integration and the underutilization of existing RPS-eligible generation by continuing to subscribe to battery storage projects, allowing renewable resources, that would otherwise be curtailed, to contribute to renewable grid supply. This storage strategy is intended to help meet peak demand in a dispatch-like manner without the reliance on dispatchable fossil-fuel resources. SDCP's encouragement of demand response assets are also intended to further support the grid in potentially strained conditions, additionally optimizing the transition from solar saturated mid-days into peak hours.

(iii) Description of How Portfolio Diversity will Maximize Ratepayer Value While Minimizing Costs and Risks.

SDCP's portfolio development was designed to minimize project development risk and technology risk to maximize ratepayer value. Given the relatively new nature of the SDCP's portfolio, this strategy was key in risk modeling and project selection. The planned diversity includes, but is not limited to, (1) choosing different times to contract with projects to ensure short-term price impacts do not impact the whole portfolio, (2) contract with projects with varying development timelines to help mitigate development risk, (3) ensuring a robust energy storage portfolio to shift renewable generation and maximize project revenues, (4) contract with projects with geographic diversity to limit localized impacts from weather and congestion, and (5) choose varying contracting structures (e.g. bundled, Index, top bottom swap) to hedge pricing risk. The combination of the above is intended to allow diversity to reduce risk and cost leading to maximization of the ratepayer value.

(iv) Description of How Energy Storage and Emerging Technologies are Addressed in Reliability and Diversity Planning.

SDCP is actively contracting with energy storage resources. To date, SDCP has contracted for

over 1,238 MW of 4-hour storage capacity and 260 MW of 8-hour storage capacity. These projects will add significant reliability to the CAISO grid while also helping to shift the abundance of solar photovoltaic generation during the middle of the day to key peak hours. SDCP's current energy storage portfolio is heavily reliant on 4-hour technologies, and it is actively looking to diversify its portfolio with both longer duration technologies and different battery composition types.

While SDCP is not opposed to considering emerging renewable generating technologies, SDCP has yet to receive credible and cost-competitive proposals from emerging renewable generating technologies. If such proposals arrive in the future, they will be closely considered alongside other viable options. SDCP's renewable supply commitments must result in reliable, cost-effective supply to promote compliance with applicable RPS mandates without bearing the risks typically associated with newer technologies. Until compelling proposals for emerging renewable generating technologies are received, SDCP will likely exhibit preferences for proven generating technologies and supply structures that will minimize delivery risk during early-stage operation while allowing for re-shaping of certain renewable generating profiles to better align supply with demand. If, however, a compelling offer is presented for a cost-effective emerging technology, SDCP will evaluate such proposal on its merits relative to other available offers.

IV.B.1 Forecasting for Increased Transportation Electrification

SDCP forecasts its future load growth by applying a fixed annual increase of approximately 1.7% in retail sales as compared to the prior year. This forecast value was derived using historical trends and is re-evaluated and adjusted based on actual load data. The load curves that SDCP prepares to support this forecast evaluate and assume increases in customer energy usage due to transportation electrification currently do not separately forecast

transportation electrification load growth. Based on SDCP's evaluation of transportation electrification load growth up to the date of the filing of this RPS Procurement Plan, transportation electrification has not caused deviations from the overall expected load growth trends because this specific sector of load growth has not been significant in comparison to competing factors, such as energy efficiency programs, customer-sited generation, and general economic impacts. This same assumption is reflected in SDCP's Integrated Energy Policy Report ("IEPR") Demand Forecast, most recently submitted 10, 2025.

However, because state and local transportation goals are likely to result in significant increases in transportation electrification in the future, SDCP will be assessing and evaluating if its near term forecasts should be adjusted based on changes likely to occur in its region. This evaluation considers light duty vehicles (personal use), electrification of vehicle fleets (commercial), and local targets for electrification of public transit systems while building electrification considers the phasing out of onsite use of natural gas for heating, cooling and other appliances in buildings through all-electric technologies. The information considered in this process includes the mid scenario identified in the California Energy Commission's IEPR Demand Forecast.⁷ SDCP is evaluating the development of a transportation electrification forecast that would also incorporate other available information that would allow such a forecast to be directly tailored to its region – this data may include local policies related to transportation electrification, if applicable, locally available incentives focused on transportation electrification, or data related to electric transportation adoption occurring within SDCP's service territory. SDCP is coordinating with its member municipalities to determine

⁷ See Javanbakht, Heidi, Cary Garcia, Ingrid Neumann, Anitha Rednam, Stephanie Bailey, and Quentin Gee. 2022. Final 2021 Integrated Energy Policy Report, Volume IV: California Energy Demand Forecast. California Energy Commission. Publication Number: CEC-100-2021-001-V4, at 65.

pertinent local targets for transportation and building electrification and, following the identification of these local planning parameters, will accordingly update its load curves to reflect such assumptions.

IV.B.2 Curtailment Frequency, Cost, and Forecasting

This Section responds to the questions presented in Section IV.B.2 of the ACR⁸ and describe SDCP's strategies and experience so far in managing SDCP's exposure to negative pricing events, overgeneration, and economic curtailment for SDCP's region and portfolio of renewable resources.

(a) Factors Having the Most Impact on the Projected Increases in Incidences of Overgeneration and Negative Market Price Hours

SDCP will continue to monitor the California energy market, including information and considerations related to energy curtailment, potential cost impacts, contracting considerations, and other concerns. The following represents SDCP's understanding of this topic, which may impact future procurement processes.

Due in large part to the rapid increase in the amount of wind and solar generating facilities that have been brought online throughout the western United States, the California Independent System Operator's ("CAISO") balancing authority area has experienced an increasing frequency and magnitude of curtailment and negative pricing events. The U.S. Energy Information Agency ("EIA") estimates that as of February 2025, California has 41,063 MW of installed solar capacity, with 18,514 MW of that total being behind-the meter solar.⁹ The

⁸ See *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 p. 19-20.

⁹ EIA, *Electric Power Monthly, Table 6.2.B. Net Summer Capacity Using Primarily Renewable Energy Sources and by State, February 2025 and 2025 (Megawatts)*, available at: https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=table_6_02_b.

CAISO reports that it has 21,042 MW of utility-scale solar and 8,373MW of utility-scale wind currently installed within its balancing authority area.¹⁰ This increased capacity results in discrete periods where the generation from wind and solar resources exceeds the total load in the CAISO during those periods. The monthly maximum load served by wind and solar in the CAISO has averaged 83.8% over the past 3 years (March 2022 to March 2025), and in April of 2024 the monthly maximum load served by wind and solar was 109.6 percent,¹¹ while the maximum 5-minute amount of all renewables serving load was 117.3 percent.¹² To address the resulting instances of over-supply, the amount of curtailment of wind and solar in the CAISO has significantly increased each year from 2015 through 2024, totaling 187,000 MWh in 2015, 308,000 MWh in 2016, 379,510 MWh in 2017, 461,043 MWh in 2018, 965,241 MWh in 2019, 1,586,500 MWh in 2020, 1,504,803 in 2021, 2,449,248 in 2022, 2,659,527 in 2023, and 3,423,376 in 2024.¹³ As of May 4, 2025, the total curtailment of solar and wind year to date is 2,314,942 MWh.¹⁴ Curtailment is typically the highest during the months of March, April, and May when hydroelectric generation is historically at its highest.

SDCP will continue to monitor this situation to the extent such circumstances are likely to impact procurement activities and contract administration. If prospective renewable generating opportunities are located in areas that are prone to frequent instances of negative market pricing (based on available historical data), SDCP will be sure to evaluate such data to

¹⁰ CAISO, What are we doing to green the grid?, updated May 4, 2025, at <http://www.caiso.com/informed/Pages/CleanGrid/default.aspx>.

¹¹ CAISO, Monthly Renewables Performance Report, May 2024, available at <https://www.caiso.com/documents/monthly-renewables-performance-report-may-2024.html>.

¹² CAISO, Monthly Renewables Performance Report, April 2024, available at <https://www.caiso.com/documents/monthlyrenewablesperformancereport-apr2024.html>.

¹³ CAISO, Managing Oversupply, Wind and Solar Curtailment Totals, updated May 4, 2025, available at <http://www.caiso.com/informed/Pages/ManagingOversupply.aspx>.

¹⁴ CAISO, Wind and Solar Curtailment, May 4, 2025, available at <https://www.caiso.com/documents/wind-solar-real-time-dispatch-curtailment-report-may-04-2025.pdf>.

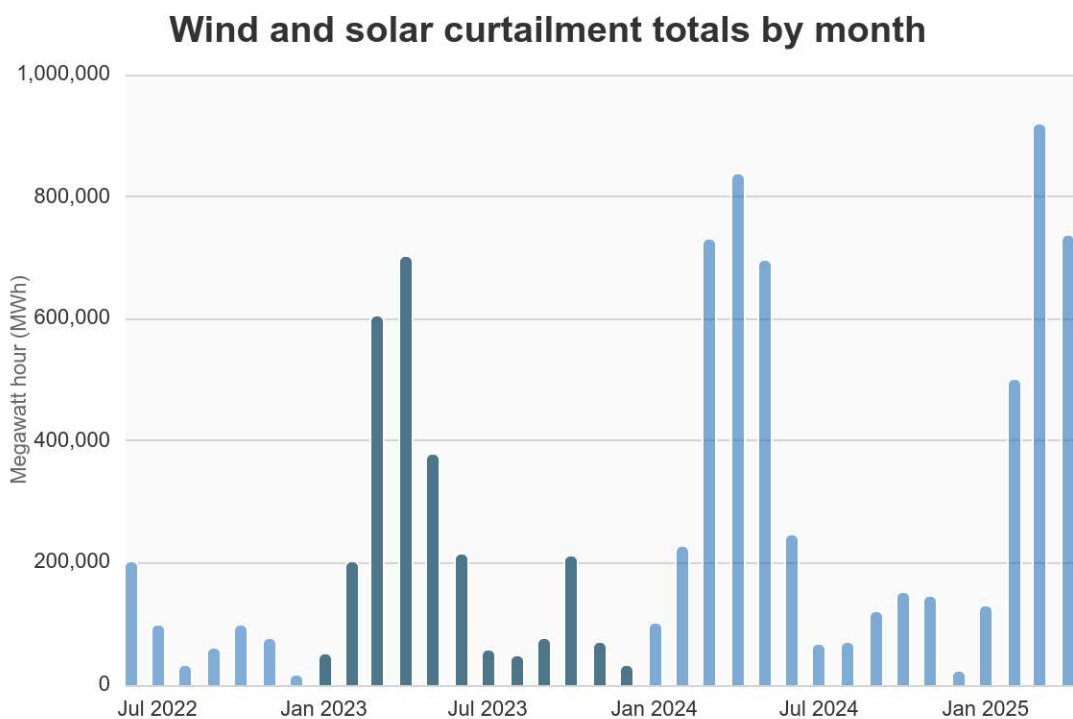
better understand prospective financial impacts and/or pursue contractual pricing structures that will insulate the CCA program from such risks. When SDCP considers specific renewable project/contract opportunities in the future, it will likely assume that incidences of over-generation will continue to occur (or increase) in areas of the state with low load and relatively high levels of generation. To the extent there are not opportunities to store, export or otherwise use such generation as it occurs, SDCP understands that market pricing would likely be suppressed to the extent that generation exceeds load; and to the extent that generation meaningfully exceeds load, market pricing could turn negative (or significantly negative). This concern was previously considered by SDCP and will continue to be considered when evaluating future renewable project/contract opportunities, and to the extent that certain project locations seem predisposed to incidences of negative pricing, SDCP will weigh such risk against other available project/contract opportunities. Ultimately, SDCP must satisfy its RPS procurement mandates and will need to procure among available opportunities, even if such opportunities present related risks to SDCP – in such instances, SDCP may seek to minimize its negative price risk through contract structures that alleviate these concerns for the buyer.

*(b) Written Description of Quantitative Analysis of Forecast of the
Number of Hours Per Year of Negative Market Pricing for the Next 10
Years*

Negative prices in the CAISO market can significantly impact the cost and overall value of renewable generating assets, particularly if such supply agreements apply market-based settlement mechanisms to determine charges assessed to the buyer. Thus, it is important that SDCP consider the siting of prospective renewable generating resources to avoid taking on unforeseen costs or lower than expected delivered energy quantities, which may result from economic curtailments. For this reason, SDCP has endeavored to quantify the potential occurrence of negative pricing events within certain areas of the state that are known to include

significant levels of renewable generating capacity. To improve its understanding of such risks, SDCP has (1) evaluated CAISO curtailment reports and (2) assembled a historic negative pricing analysis with the average results of such analysis being used to inform SDCP’s long-term energy price forecast that includes a ten-year negative price forecast. SDCP notes that moderately negative prices are not expected to trigger meaningful economic curtailments, as the cost of procuring replacement RPS supply under index-plus pricing arrangements would likely be equivalent in cost; in such instances, there would be little sense for SDCP to curtail renewable energy deliveries.

Below is the latest CAISO chart showing the number of potential historic curtailment



events. Curtailment volumes have increased in the spring consistently for the past three years and that trend is expected to continue until more batteries are available on the CAISO system.

Using the historic data illustrated above, SDCP has created a nodal forecast that factors in the correlation of nodal pricing to hub pricing and CAISO curtailment incidents. This forecast

will be used to model future project opportunities to determine the project specific curtailment profile. This forecast methodology allows SDCP to estimate the quantity of time energy will be curtailed from a renewable energy project and its impacts on both portfolio economics and the as-risk volumes for renewable deliveries.

(c) Experience, to Date, With Managing Exposure to Negative Market Prices and/or Lessons Learned from Other Retail Sellers in California

SDCP understands the exposure to negative price risk and that it should pay close attention to historical nodal energy prices near areas where prospective renewable generating facilities may be located. Gathering such information will facilitate an improved understanding of the frequency and significance of instances involving negative pricing and may influence project rankings within SDCP-administered solicitation processes. SDCP understands that negative pricing is more prevalent in certain geographic regions throughout the state, so contracting with generating resources located within or adjacent to such areas may expose the organization to higher-than-expected renewable energy and compliance costs. SDCP is aware that certain contract structures, including “index-plus” pricing arrangements, may substantially minimize the financial impacts related to negative pricing. For example, numerous CCAs have pursued the use of index-plus pricing structures and, as a result, such contracts are generally insulated from instances involving negative market prices and/or curtailment risk. Another effective mitigation measure for negative price risk is the co-located installation of battery storage infrastructure with intermittent renewable generating capacity. Such infrastructure generally allows the buyer to shift some or all of the renewable energy production away from times of day when negative pricing can be particularly prevalent, allowing for the delivery of such power at times of day when market pricing is higher. SDCP has evaluated contracting with curtailment bid cap arrangements, as well as the inclusion of energy storage infrastructure, to

minimize the risk of curtailment and negative pricing. In fact, all of SDCP's initial long-term renewable energy supply contracts for solar generation incorporate the use of battery storage to facilitate the shifting of production curves to better align with customer energy use and market pricing conditions. During its solicitation processes, SDCP will evaluate negative pricing history, as needed, for project opportunities that may expose the organization to such risks.

SDCP is pursuing a diversified portfolio of RPS contracts that seek to utilize a variety of contract structures, generating technologies, resource locations, suppliers, risk allocation mechanisms, and other considerations.

(d) Direct Costs Incurred, to Date, for Incidences of Overgeneration and Associated Negative Market Prices

Based on current supply contracts, SDCP has yet to incur direct costs related to negative pricing (for incidences of overgeneration associated with renewable generating facilities). However, there has been indirect cost related to curtailments of index-plus contracts that reduce delivery volumes.

(e) An Overall Strategy for Managing the Overall Cost Impact of Increasing Incidences of Overgeneration and Negative Market Prices

The direct costs associated with incidences of overgeneration are an unfortunate reality. It is the goal of SDCP to minimize these costs wherever possible by investigating mitigation strategies and learning lessons to avoid negative pricing through certain contracting mechanisms and operational strategies. While curtailment is a viable renewable integration strategy that is generally more cost-effective than other options, there are potential negative consequences from excessive curtailment. Curtailment of solar and wind represents a lost opportunity to generate zero GHG-emitting electricity, and excessive curtailment could impact the ability of the state to meet its environmental and energy policy goals. Additionally, these over-supply situations expose ratepayers to increased costs because their LSEs must either economically curtail the

generating resource (and often pay for the electricity that was not generated) or generate power and be exposed to negative prices. Because these conditions are largely driven by state policy, it is appropriate to consider macro-level mitigation measures through CAISO initiatives, Commission rulemakings, and possibly even legislation. There are a number of measures and policies that have already been implemented or are currently being pursued that will have significant impacts on curtailment in the future. This includes the expansion of the Energy Imbalance Market, improvements to the CAISO market design, enhanced forecasting capabilities, time-of-use rates, improved EV charging functionalities, smart deployment of distributed energy resources, and furthered regional integration. The Commission's IRP proceeding will be an appropriate forum to measure the impact of these policies and the effect that they will have on future curtailment. These new measures will need to be modeled and incorporated into forecasts of future curtailment.

(f) Contract Terms Included in RPS Contracts Intended to Reduce the Likelihood of Curtailment or Protect Against Negative Prices.

As described elsewhere in this RPS Procurement Plan, SDCP is aware of potential cost, compliance, and environmental impacts of negative market prices and associated curtailment of renewable resources. SDCP is building its supply portfolio with the intent to limit SDCP's exposure to negative pricing. SDCP has incorporated a number of strategies and relevant contract provisions to further reduce curtailment and negative price risk. Primarily, SDCP has not signed a PPA with a solar-only (i.e. not co-located or hybridized with energy storage) generating facility that exposes SDCP to any market price exposure; instead, SDCP has preferred to contract with solar-plus-storage hybrid facilities. When contracting for solar or wind output not associated with hybrid or co-located facilities, SDCP has pursued index-plus pricing structures or fixed-volume contracts to ensure the same protection against negative

prices and reductions in deliveries due to curtailment. When contracting with hybrid facilities that result in exposure to market prices, SDCP has maintained full dispatch rights of the facility to ensure that it can shift deliveries from negatively priced intervals and into higher priced periods, both to increase market revenues received and to reduce the magnitude of curtailed renewable generation. SDCP is likely to employ these strategies in future contracting while monitoring, exploring, and evaluating additional techniques to hedge against these potential outcomes.

IV.C Portfolio Optimization

SDCP's goal is to meet organizational policies, reliability requirements, and statewide procurement mandates in a manner that is both cost effective and supportive of a well-balanced resource portfolio. Portfolio optimization strategies can help reduce costs and should facilitate alignment of SDCP's portfolio of resources with its forecasted load needs. To support this goal, SDCP considers the following strategies:

- **Purchases from Retail Sellers:** Purchases of RPS-eligible renewable energy (via resale) from other retail sellers can provide a cost-effective way of meeting short-term resource needs or filling in gaps in procurement while long-term projects are under development.
- **Sales Solicitations:** As SDCP's portfolio of resources continues to develop, it will also consider offering solicitations of sales to other retail sellers, if the disposition of surplus is deemed desirable. SDCP's willingness to pursue such sales will be dependent upon its ongoing monitoring of RPS positions, prospective sales pricing, and direction received from its Governing Board and executive management.
- **Optimizing Existing Procurement:** As SDCP considers its long-term resource needs, it may evaluate options in its future power purchase agreements to increase the output of

existing generating facilities through technological upgrades, by adding new capacity to an existing generator or by adding energy storage infrastructure to an existing renewable generator. Expanding existing facilities may provide additional generation at reduced costs with lower risks of project failure because the need for distribution system upgrades and permitting may be reduced – such opportunities may be pursued as deemed appropriate by SDCP. The addition of energy storage infrastructure to an existing renewable generator would be expected to enhance grid reliability as well as the value of electric energy produced by the generating facility, as the pre-storage energy delivery profile could be shifted to: 1) better align SDCP’s supply with customer demand; or 2) create more value for SDCP customers by shifting electric energy deliveries to a time of day when market revenues received would be greater. In terms of reliability impacts related to the addition of energy storage infrastructure, SDCP expects that such enhancements would meaningfully increase the proportionate level of resource adequacy capacity that could be derived from an intermittent renewable generating resource without such storage infrastructure – reductions to the net qualifying capacity of intermittent renewable generating resources are well documented and ongoing, resulting in very little capacity benefits from solar-only generating projects. In considering these sorts of enhancements, SDCP will be mindful of the need to coordinate with its resource owners to evaluate potential planning constraints (related to generator interconnection, for example) before assuming that the addition of energy storage infrastructure at an existing generating facility would be a viable option.

- **Holistic Portfolio Design and Procurement Strategy:** In light of the multiple procurement-related compliance requirements with which California LSEs must comply

– RA (administered both by CAISO and CPUC), Integrated Resource Planning (D. 20-15-003, Mid-Term Reliability, etc.), RPS (including long-term contracting requirements), in addition to any LSE-specific incremental or voluntary program goals – SDCP is mindful to take a holistic approach to procurement efforts. Targeting resources that can satisfy multiple compliance or voluntary objectives provides for more efficient and cost-effective procurement than alternative approaches that may target individual compliance products or requirements one-by-one without consideration of synergies or economies of scale that may result from resources that can deliver products to satisfy multiple program requirements and evaluating projects and proposals as such to ensure that the co-benefits and efficiencies of such procurement are correctly incorporated.

On June 24, 2021, the Commission adopted Mid-Term Reliability (“MTR”) Requirements through D.21-06-035, which directed all retail sellers to procure 11,500 MW of new net qualifying capacity (“NQC”) between 2023 and 2026 and assigned each retail seller a specific procurement responsibility based on its share of peak demand. SDCP’s total obligation is 570 MW, which must include minimum amounts of procurement from certain subcategories: (1) 124 MW from firm, zero-emitting capacity by 2025; (2) 50 MW from long duration storage resources by 2028; and (3) 49 MW from firm, non-fossil fueled baseload generating resources by 2028.

Pursuant to the allowance in D.21-06-035 for retail sellers within the same Transmission Access Charge (“TAC”) area to reallocate procurement obligations upon mutual agreement, SDCP and SDG&E have collaborated to revise their obligations in D.21-06-035, which were based on preliminary load forecasts that have since been refined. SDG&E filed the revised, mutually agreed capacity requirements to the CPUC on March 16, 2022 via Advice Letter 3967-

E. This advice letter was suspended and later approved in June 2022. The mutually agreed reallocation of the procurement obligations resulted in a total obligation of 455.7 MW for SDCP, which must include minimum amounts of procurement from certain subcategories: (1) 98.9 MW from firm, zero-emitting capacity by 2025; (2) 40 MW from long duration storage resources by 2028; and (3) 39.3 MW from firm, non-fossil fueled baseload generating resources by 2028. Additionally, on February 23, 2025, the Commission adopted D. 23-02-040 ordering supplemental MTR procurement for SDCP of 80 MW for both 2026 and 2027.

SDCP's contracts executed pursuant to its 2020 Long-term RPS solicitation fulfilled a portion of its 2023-2025 obligations. These volumes were supplemented by additional volume from VAMO and IOU market offer contracts along with other short-term contracts. SDCP's Long-term RPS solicitations from 2022 to 2025 focused on meeting any remaining procurement obligations from D.21-06-035 and D. 23-02-040. SDCP submitted its most recent MTR compliance filing on June 2, 2025 in the IRP proceeding (D. 20-05-003).

IV.C.1 Conformance with the IRP Proceeding

The resources identified in this RPS Procurement Plan are consistent with resources that will be identified in SDCP's 2025 IRP, which will be approved by SDCP's governing board and provided to the Commission for certification by November 1, 2025,. As required by the ACR, SDCP includes the following table that describes how SDCP's 2025 RPS Procurement Plan conforms with the determinations made in the IRP proceedings (R.16-02-007 and R.20-05-003). As required, SDCP will highlight the interrelationships of its RPS and IRP planning processes in a future iteration of this RPS Procurement Plan. The following table reflects SDCP's most recent updates, as reflected in its RPS Procurement Plan, regarding RPS alignment with the IRP process.

IRP Section Subsection	RPS Alignment in IRP	
III. Study Results A. Preferred and Conforming Portfolios	Retail sellers should explain how the RPS resources they plan to procure, outlined in their RPS Plan, will align with each portfolio to be developed in their IRP. In addition to the list of the IRP portfolios developed and portfolio descriptions submitted for Commission approval and certification in IRP Plans, this should include:	
	<i>1. Existing RPS resources that the retail seller owns or contracts.</i> <i>2. Existing RPS resources that the retail seller plans to contract with in the future.</i> <i>3. New RPS resources that the retail seller plans to invest in.</i> <i>4. New and existing resources that will be used to meet Mid-Term Reliability obligations adopted in D.21-06-035 and the supplemental procurement ordered in D.23-02-040.</i>	As part of its 2022 IRP filing, SDCP submitted two Preferred Conforming Portfolios that achieve its proportional share of both the 30 and 25 MMT GHG targets by 2035. These targets were in addition to the requirements in D.22-02-004 which require LSEs to meet their proportional share of the 2030 target of 38 MMT and plan for a 2030 target of 30 MMT. Because SDCP has yet to finalize its initial long-term RPS supply commitments that will contribute to the achievement of such portfolio goals, this document reflects those resources that SDCP intends to contract with in the future. Such procurement efforts are expected to contribute to the achievement of relevant GHG targets as well as RPS procurement requirements, including the 65% long-term contracting requirement. Description of 2022 Conforming Portfolios: • 30 MMT Conforming Portfolio: Portfolio that achieves SDCP's proportional share of a 30 MMT statewide GHG target. ○ The 30 MMT Conforming Portfolio assumed the use of new RPS resources not yet placed under contract, including: 1,425 MW of new hybrid resources (which would include 750 MW of battery storage to promote grid reliability); 550 MW of new wind resources; and 100 MW of new geothermal resources. ○ The 30 MMT Conforming Portfolio also assumed the use of existing RPS resources not yet placed under contract, including:

		250 MW of existing wind resources. ○ SDCP's 30 MMT portfolio conformed to the procurement timing, resource quantities, and general resource attributes identified in the 30 MMT reference system plan. ● 25 MMT Conforming Portfolio: Portfolio that achieves SDCP's proportional share of a 25 MMT statewide GHG target. ○ The 25 MMT Conforming Portfolio assumed the use of new RPS resources not yet placed under contract, including: 1,425 MW of new hybrid resources (which would include 750 MW of battery storage to promote grid reliability); 550 MW of new wind resources; and 100 MW of new geothermal resources. ○ The 25 MMT Conforming Portfolio also assumed the use of existing RPS resources not yet placed under contract, including: 250 MW of existing wind resources. ○ SDCP's 25 MMT portfolio conformed to the procurement timing, resource quantities, and general resource attributes identified in the 25 MMT reference system plan. Meeting the Mid-Term Reliability obligations from D.21-06-035: ○ SDCP met the Mid-Term Reliability ("MTR") cumulative obligations for 2023-2025 via resources that are currently under contract that achieved commercial operation by 2025. SDCP's RPS RFO's in Q4 2022 and Q1 2023 targeted resources that could
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		address any outstanding requirements for resources to be online in 2025 or, should they present, in 2023 or 2024. After experiencing project delays, SDCP also procured short-term bridge capacity to close its short position for 2023-2025 and ultimately meet the compliance requirements by the June 2, 2025 MTR filing. With respect to Long Leadtime obligations for resources to be online in 2026, SDCP closed its solicitation on July 6, 2022 for “clean firm” resources and closed another solicitation for stand-alone storage, including long-duration energy storage resources, in Q2 2023. SDCP notes that per D.23-2-040, see below, these long lead time obligations are now for resources to be online by 2028. Meeting the Mid-Term Reliability obligations from D.23-02-040: ○ SDCP expects to meet the additional Mid-Term Reliability (“MTR”) obligations for D.23-02-040. via resources that are under negotiation from its 2023 Long-Term RPS RFO seeking projects with CODs through 2028. Additionally, SDCP is in negotiation with projects from its 2023 Stand-Alone Storage RFO for long-duration storage projects that would be considered long-lead time resources needed by 2028 under D.23-02-040. SDCP also issued a 2025 Clean-Firm RFO seeking offers for resources that would meet the long lead time obligations to be online by 2031.
IV. Action Plan	Retail sellers should describe how they propose to use RPS resources to implement their Preferred Portfolio. Narratives should include:	

A. Proposed Activities	<i>1. Proposed RPS procurement activities as required by Commission decision or mandated procurement.</i> <i>2. Description of RPS resources identified in the Study Results section that correspond to proposed activities.</i> <i>3. Procurement plans, potential barriers, and resource viability for each new RPS resource identified.</i>	To ensure compliance with its GHG and RPS targets, SDCP plans to substantially rely on GHG-free and RPS-eligible resources while contributing to statewide reliability requirements and responsibly managing overall portfolio costs. This approach is generally consistent between the 30 MMT Conforming Portfolio and 25 MMT Conforming Portfolio in the 2022 IRP Plan. In its IRP, SDCP also established that its planned incremental capacity exceeds its pro rata share of capacity that may be needed for replacement of Diablo Canyon. These resources are further described in SDCP’s 2022 IRP and, following collaboration with SDG&E to realign MTR procurement obligations and associated procurement and contract administration, SDCP exceeded requirements related to replacement of Diablo Canyon through resources under contract that came online in 2024. SDCP expects to administer future solicitation processes to fill outstanding resource needs required to meet portfolio specifications reflected in its 30 MMT and 25 MMT Preferred Conforming Portfolios as well as ongoing RPS procurement obligations. As noted elsewhere in this RPS Procurement Plan, SDCP will update the Commission with regard to the outcomes of its current long-term RPS contract negotiations in a future iteration of this planning process. SDCP does not foresee any barriers or viability concerns related to its requisite resource commitments but will advise the Commission if this impression changes over time.
IV. Action Plan	The retail seller should describe the solicitation strategies for the RPS resources that will be included in their Preferred Portfolio. This description should include:	
B. Procurement Activities	<i>1. The type of solicitation.</i> <i>2. The timeline for each solicitation.</i>	SDCP may participate in distinct solicitations for different products (for example: specific renewable energy products, generating resources or storage infrastructure), or it may choose to solicit multiple products in the same

	<i>3. Desired online dates.</i> <i>4. Other relevant procurement planning</i>	solicitation. These solicitations will be competitive and may be similar to SDCP's initial long-term RPS solicitation, which was previously described in this RPS Procurement Plan. SDCP will administer future solicitations, as necessary, to promote consistency with the resource development plan identified in the IRP (for purposes of promoting achievement with state-mandated RPS targets as well as SDCP's internal targets). As noted above, SDCP anticipates administering upcoming solicitation activities consistent with the process and timeline described in Section I. During administration of future procurement processes, SDCP will utilize the evaluative and contract management processes (further described elsewhere in this Plan) to promote timely project completion and improve planning certainty.
IV. Action Plan C. Potential Barriers	Retail sellers should provide a summary of the barriers that will be identified in their Preferred Portfolio as they relate to RPS resources. The section should include: <i>1. Key market, regulatory, financial, or other resource viability barriers or risks associated with the RPS resources coming online in retail sellers' Preferred Portfolios.</i> <i>2. Key risks associated with the potential retirement of existing RPS resources on which the retail seller intends to rely in the future.</i>	SDCP does not expect any procurement barriers to impede its future contracting for new renewable energy resources, but notes that even though a balanced, diverse RPS portfolio is desirable, the limited resource availability and lead time required for some technology types may necessitate planning flexibility. SDCP also observes that the rigorous demands of California's RPS program, particularly the currently effective 65 percent long-term contracting mandate, may necessitate contracting activities with a portfolio of resources that will evolve considerably over time – more specifically, SDCP may need to pursue initial supply commitments with a portfolio of resources that does not exactly reflect its eventual/ideal characteristics related resource diversity and/or reliability. Pursuit of such portfolio characteristics will continue to be a work in progress during SDCP's first several procurement efforts and will evolve throughout

		the upcoming 10-year planning period. The key risk affecting SDCP’s achievement of the 46 MMT and 38 MMT Preferred Conforming IRP Portfolios in the 2020 IRP Plan and the 30 MMT and 25 MMT portfolios in the 2022 IRP Plan is reliance on new resources – while SDCP intends to contract with highly experienced and qualified project developers (when new-build resources are deemed necessary), there is always a limited risk of project failure. In consideration of SDCP’s existing RPS contract negotiation processes that will support achievement of parameters of the Preferred Conforming IRP Portfolios, it does not have any substantive concerns regarding its ability to fulfill and achieve levels of renewable energy procurement that will be required to satisfy pertinent RPS mandates or IRP targets. If such concerns happen to change in the future, SDCP will accordingly notify the Commission in a subsequent iteration of this planning process. However, SDCP wants to note that delays in network upgrades required for interconnection and deliverability could affect the whole industry and places development risk on RPS project.
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IV.C.2 Responsive to Local and Regional Policies

(i) Responsiveness to Policies of SDCP’s Governing Board

SDCP is a joint powers authority that is subject to the control of its governing board and is directly accountable to its Member Agencies. SDCP supports and is committed to meeting the state’s GHG reduction and renewable procurement goals, as well as supporting its Member Agency cities in meeting their respective CAP goals. Furthermore, as noted elsewhere in this RPS Procurement Plan, SDCP has adopted near-term renewable portfolio targets that aim to exceed RPS mandates. SDCP has also determined to: 1) forgo the direct purchase of PCC3 products; and 2) limit the use of PCC2 products (in favor of PCC1 products), subject to product

availability and budgetary impacts. SDCP's Governing Board has decided to structure its RPS portfolio with these considerations in mind, as such an approach is expected to minimize attributed GHG emissions associated with its reported energy purchases (under California's Power Source Disclosure Program). In addition to state mandates and meeting the respective CAP goals of SDCP's Member Agencies, as detailed below, on June 23, 2022, SDCP's Governing Board adopted additional targets for its energy portfolio development, including: goals of 50 percent green (renewable and carbon-free) energy content in 2022, 75 percent in 2027, 85 percent in 2030 and 100 percent in 2035; 15 percent of energy portfolio capacity from new, distributed infill storage or solar plus storage resources within Member Agencies' territory by 2035; and 600 MW of new utility scale projects within San Diego and Imperial Counties by 2035, all of which will impact SDCP's energy portfolio strategies.

SDCP is also implementing solicitations for the Disadvantaged Communities - Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT"). On May 19, 2023, SDCP submitted a Tier 2 AL 13-E, seeking CPUC approval for SDCP's DAC-GT and CSGT solicitation materials. The DAC-GT and CSGT solicitation documents include the Request for Offer (RFO) Protocol, Term Sheet, and Generation Offer Form. The Commission approved the material in June 2023. SDCP released the DAC-GT and CSGT solicitation documents in August 2023, with responses due February 24, 2024. SDCP contracted with one project under the first DAC-GT solicitation. In April 2025, SDCP released its second DAC-GT solicitation.

(ii) Responsiveness to Regional Policies

As noted in the previous sub-section, SDCP is overseen by its governing board. As such, the policies adopted by SDCP's governing board serve as guiding directives for CCA operations, including the determination of renewable energy planning targets that are intended to support local policy preferences. Reducing electric utility sector GHG emissions generated by residents

and businesses was a driving factor in the formation of SDCP, as well as investing in the community through local projects. The City of San Diego adopted its CAP in December 2015, which sets a goal for 100 percent renewable energy city-wide by 2035.¹⁵ The City of Encinitas adopted and updated CAP in 2020 with a goal to reduce emissions to 44 percent below 2012 levels by 2030.¹⁶ The City's establishment of a CCA program will have a significant impact on its emissions goals with a reduction of 19,465 MTCO₂e, the largest of the prospective reductions reflected in the updated CAP's 20 GHG reduction strategies.¹⁷ Similarly, the City of La Mesa adopted its CAP in March 2018, which set a goal to reduce emissions by 68,450 MTCO₂e by 2035.¹⁸ The City of Chula Vista adopted its CAP in September 2017, and it established a goal for up to 100 percent clean energy through the formation of a CCA program.¹⁹ The City of Imperial Beach adopted a CAP in July 2019 which set a goal for 85 percent renewable energy by 2030.²⁰ SDCP's newest Member Agencies – National City and San Diego County – were also motivated in part to join SDCP as a strategy to meet their respective CAP goals and several Member Agencies are in the process of updating their CAPs. The Member Agencies intend to contribute to achieving these and future goals collaboratively by operating SDCP to provide electric energy to residential, commercial and governmental electric accounts located within their

¹⁵ See *Climate Action Plan*, City of San Diego, December 2015, at 35, available at https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf.

¹⁶ See *Climate Action Plan Interim Revision*, City of Encinitas, November 2020, at 1-7, available at https://encinitasca.gov/Portals/0/City%20Documents/Documents/City%20Manager/Climate%20Action/CAP_2_3_2021_final.pdf?ver=2021-02-03-151752-820.

¹⁷ See *Climate Action Plan Interim Revision*, City of Encinitas, at 3-7.

¹⁸ See *Climate Action Plan*, City of La Mesa, March 13, 2018, at 45, available at https://www.cityoflamesa.us/DocumentCenter/View/11008/LMCAP_CC03132018.

¹⁹ See *Climate Action Plan*, City of Chula Vista, September 2017, at 20, available at <https://www.chulavistaca.gov/home/showdocument?id=15586>.

²⁰ See *Local Coastal Program Resilient Imperial Beach Climate Action Plan*, City of Imperial Beach, July 17, 2019, at 31, available at <https://www.imperialbeachca.gov/ApprovedClimateActionPlan2019>.

communities and delivering supportive customer programs.

IV.D Lessons Learned – Assessment of RPS Portfolio Supplies and Demand

SDCP continues to evaluate historical pricing trends, which have materially changed in the wake of increased renewable energy buildout, as well as supply chain backlogs.

Additionally, complexities and delays in the deliverability allocation process have put risk on project commercial operation dates and viability as energy-only projects. SDCP appreciates the substantial financial risks that are created by California’s long-term renewable contracting requirements and will continue to explore opportunities to manage such risks during its contracting efforts. SDCP also observes that technological diversity is an important principal to incorporate in RPS planning efforts.

SDCP is also aware that prudent planning and successful management of CCA program finances is critical in managing ongoing market risk and other uncertainties. As such, SDCP will exercise care in pursuing its renewable energy supply options to promote alignment with budgetary parameters. SDCP may also pursue interagency solicitation/procurement opportunities to the extent that such coordinated efforts can increase procedural efficiency, reduce administrative redundancy, and decrease certain expenses typically associated with such processes.

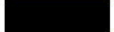
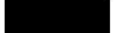
As noted in previous planning documents, SDCP remains attentive to evolving market pricing conditions and will continue to evaluate historical pricing within geographic areas where renewable energy procurement opportunities are being considered, so long as the settlement structures associated with such procurement opportunities expose SDCP to market-based pricing risk. For now, SDCP has elected to pursue risk mitigation measures that are focused on: 1) the identification of highly qualified renewable energy suppliers – based on SDCP’s recently

completed risk assessment and the assignment of risk ratings related to key risk factors, the identification of highly experienced RPS suppliers remains the most important consideration in ensuring that contracted RPS deliveries are fulfilled according to plan; 2) substantial levels of over-procurement created by SDCP's initial renewable energy procurement target that commences at 50 percent and increases over time to 100% by 2035; and 3) the pursuit of contract structures that minimize the risk of delivery shortfalls by providing SDCP with fixed delivery quantities and/or financial protections that generally offset the impacts of financial penalties (prescribed under the RPS Program) in the event of non- or under-delivery.

V. Project Development Status Update

As described in Section IV.B above, SDCP's current and planned procurement is expected to be sufficient to meet both the applicable RPS procurement requirements as well as support the state's GHG reduction targets. Further, SDCP's current and planned procurement is expected to support system reliability by considering both portfolio diversity and alignment with SDCP's customers' load curve. SDCP has entered into twelve agreements with RPS-eligible facilities, with four having reached commercial operation. Additional SDCP has entered into five agreements with Investor-Owned Utilities that have online assets through or market offers. These agreements are summarized in the following table.

Facility Name	Technology Type	MW-ac	Location	Term Length	Expected COD	Network Upgrades Milestone	Development Phase
VAMO	Various	Portfolio	Various	10	On-line	Complete	Post-Construction
SDG&E ST (LT) MO	Various	Portfolio	Various	2	On-line	Complete	Post-Construction
SDG&E LT (LT) MO	Various	Portfolio	Various	16	On-line	Complete	Post-Construction
PG&E ST (LT) MO	Various	Portfolio	Various	2	On-line	Complete	Post-Construction

PG&E LT (LT) MO	Various	Portfolio	Various	20	On-line	Complete	Post-Construction
Duran Mesa	Wind	50	Torrance County, New Mexico	10	On-line	Complete	Post-Construction
Burney Forest Products	Biomass	29	Burney, CA	5	On-line	Complete	Post-Construction
IP Oberon	Solar	75	Riverside, CA	15	On-line	Complete	Post-Construction
Vikings Energy Farm	Solar + Storage	136.8	Imperial, CA	20	On-Line	Complete	Post-Construction
Arrowleaf Solar and Storage	Solar + Storage	42	Imperial, CA	20			Construction
Yellow Pine III	Solar + Storage	35	Clark County, NV	20			Pre-Construction
JVR Energy Park	Solar + Storage	90	San Diego, CA	20			Pre-Construction
CDH Vidal LLC	Solar + Storage	160	San Bernadino, CA	20			Pre-Construction
SunZia PowerCo LLC	Wind	150	New Mexico	15			Pre-Construction
Pelican's Jaw Solar LLC	Solar + Storage	440	Kern County	15			Pre-Construction
Noble Solar LLC	Solar + Storage	400	Clark County, NV	20			Pre-Construction
Luminia Distributed Energy Projects	Solar + Storage	5.49	San Diego, CA	20			Pre-Construction

Seven of SDCP's twelve long-term RPS contracts are associated with generating resources that have yet to achieve commercial operation. These projects include:

- JVR Energy Park, LLC: a new 90 megawatt photovoltaic solar array (plus battery

storage) located in San Diego County that is expected to commence commercial operation in Q4 2026.

- Arrowleaf Solar and Storage (Orni 30 LLC): a new 42 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Imperial County that is expected to commence commercial operation in Q4 2025.
- Yellow Pine Solar III, LLC: a new 35 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in Q2 2027.
- CDH Vidal LLC: a new 160 megawatt photovoltaic solar array (plus 160 MW battery storage) located in San Bernadino County that is expected to commence commercial operation Q4 2026.
- Sunzia Wind PowerCo, LLC: a new 150 megawatt renewable wind energy generation, located in New Mexico that is expected to commence commercial operations in Q2 2026;
- Pelican's Jaw Solar LLC: a new 440 megawatt photovoltaic solar array (plus 238.5 MW battery storage) located in Kern County that is expected to commence commercial operation in Q3 2026.
- Noble Solar LLC: a new 400 megawatt photovoltaic solar array (plus 400 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in Q2 2028.
- Luminia Projects: a group of small distributed solar and storage projects totaling 5.49 MW of solar (plus 20.57 MW battery storage) located in San Diego, California that are expected to commence commercial operation in 2027.

In consideration of SDCP's recent contracting efforts with new renewable generating

resources, it has updated Appendix D, the Project Development Status Update Report. SDCP is aware of the pandemic, geopolitical, supply-chain, and deliverability impacts that many LSEs and developers are currently facing related to new resource development and is working closely with each of its contractual counterparties to monitor and mitigate any potential impacts of these delays on SDCP's supply portfolio, market exposure, RPS compliance, and customer rates. As new information related to SDCP's renewable energy contracting process(es) becomes available, SDCP will update its Project Development Status Update Report accordingly.

VI. Potential Compliance Delays

Based on recently completed and expected renewable energy procurement efforts and the acceptance of VAMO allocations, SDCP does not anticipate any compliance delays related to Compliance Period 4, which includes calendar years 2021-2024. If a future compliance issue is identified or SDCP encounters challenges in securing requisite renewable energy supply in the future, then SDCP will address such issue within a subsequent RPS Procurement Plan.

SDCP will continue assessing projected long-term open positions (that may exist in CP5 and CP6) relative to expected deliveries and intends to administer future solicitations, as necessary, to ensure compliance with the RPS Program over the upcoming 10-year planning horizon. If a future compliance issue is identified or SDCP encounters challenges in securing requisite renewable energy supply, then it will address such issues in a subsequent RPS Procurement Plan.

VII. Risk Assessment

VII.A Compliance Risk

An important element of SDCP's RPS risk assessment process is determining potential vulnerabilities related to procurement and/or delivery shortfalls that could trigger deficits relative to SDCP's anticipated compliance obligations. Considering SDCP's internally adopted renewable energy procurement targets and existing contractual commitments, this risk, as internally determined by SDCP, appears to be very low in Compliance Period 4 and beyond. As discussed elsewhere in this planning document, SDCP has established a VMoP, which exceeds its MMoP, informs RPS procurement efforts, and insures against compliance-related shortfalls. More specifically, SDCP received a letter from the CPUC's Deputy Executive Director for Energy and Climate Policy on December 9, 2022, which provided an assessment of the perceived RPS compliance risk for Compliance Period 4 (calendar years 2021 through 2024). SDCP's risk level was categorized as low within this assessment letter, which was based on information included in SDCP's 2021 RPS Compliance Reports, as submitted in the summer of 2022.

SDCP understands that it was not at risk of failing to meet its Compliance Period 2021-2024 RPS long-term procurement and RPS procurement quantity anticipates that it will not be at risk for future compliance periods either. SDCP believes that its internally adopted renewable energy procurement targets (reflective of its VmoP and MMoP), which meaningfully exceed RPS mandates, as well as existing contractual commitments, leave SDCP very well positioned to meet its ongoing RPS compliance obligations. If anything happens to change in terms of SDCP's internal assessment of RPS compliance risk, it will inform the CPUC accordingly in a future RPS Procurement Plan.

VII.B Risk Modeling and Risk Factors

SDCP makes reasonable efforts to minimize the risk of renewable procurement shortfalls for purposes of complying with applicable RPS mandates established in SB 100, but it cannot definitively predict the scope or magnitude of circumstances that may impact annual retail energy sales, renewable energy markets, or individual project performance. With this in mind, SDCP responsibly assesses RPS compliance risk by considering three key planning elements: 1) retail sales variability; 2) renewable energy production variability; and 3) impacts to overall system reliability associated with SDCP's planned RPS purchases and other influences. These topics are generally considered in the noted sequence with observed risks informing potential adaptations to SDCP's planning process, potential adaptations to planning reserves and, ultimately, refinements to SDCP's renewable energy procurement (or sales) processes and quantities. SDCP utilizes advanced quantitative analytic software and tools to calculate at-risk metrics for both volumes and gross margin on a project and portfolio level. This helps SDCP develop a risk management policy and determine which risk factors are critical for RPS targets.

As described elsewhere in this RPS Procurement Plan, SDCP's previously executed renewable supply contracts, current negotiating efforts, and ongoing procurement processes will place the organization in a strong position to meet applicable RPS compliance requirements in Compliance Period 4 and beyond. Therefore, SDCP's self-determined risk of non-compliance is low. Nevertheless, SDCP continues to assess demand-side and supply-side risks to better understand potential areas of concern and to promote achievement of organizational compliance objectives.

Regarding demand-side risk, SDCP continues to evaluate and update prospective retail sales related to its evolving customer base and trailing 10-year planning period, including but not limited to anticipated changes related to customer eligibility, new development projects (that

could increase retail energy consumption), business closures, expected customer attrition (or growth) and changes to behind-the-meter generating capacity. From a practical perspective, the greatest demand-side risk with regard to SDCP's anticipated customer base is that retail sales are meaningfully higher than anticipated during Compliance Period 5. As the Commission is aware, CCAs provide an opportunity for customer choice, allowing customers to voluntarily participate in SDCP's program or remain bundled customers of the incumbent utility, SDG&E. To the extent that customers choose to leave SDCP's CCA program, SDCP's retail sales will decrease, resulting in related increases to the ratio of renewable energy serving such customers (and improving SDCP's position relative to applicable RPS compliance mandates). It is unlikely that SDCP's renewable supply commitments will provide volumetric flexibility in the event of higher-than-anticipated retail sales volumes; in such instances, SDCP would need to pursue additional procurement opportunities to address unanticipated open positions. Because SDCP's anticipated participation rates are based on the well-documented experience of California's other operational CCA programs, and SDCP's own experience, the organization is confident that actual retail sales will be reasonably well aligned with related forecasts.

Considering SDCP's ongoing coordination with member municipalities and associated planning departments, SDCP expects to be well informed regarding upcoming development projects or other customer changes that could materially increase retail sales. For this reason, SDCP believes that demand-side RPS compliance risk is low.

Regarding supply-side risks, SDCP is aware of the generation variability and intermittency associated with certain renewable technologies as well as the possibility of curtailment (based on pricing considerations or market directives), especially during certain seasons and times of day. In the case of new-build renewable projects, SDCP is also aware of

the possibility of project delays and, potentially, project failure. Such circumstances can materially diminish renewable energy deliveries, jeopardizing the achievement of RPS compliance and exposing the organization to unexpected financial consequences. This noted, a primary objective of the SDCP's CCA program is offering participating customers stable and competitive retail generation rates, so the organization must balance generalized over-purchasing of certain compliance products, including RPS-eligible renewable energy, with related budgetary impacts. In its RPS planning process, SDCP has considered such impacts as well as previous procurement practices, which have satisfied applicable compliance mandates reflected in California's RPS program. Long-term RPS procurement typical lead times (between contract execution and project completion) associated with new-build renewable energy projects are often 2-3 years or longer. It is becoming more commonplace that contracting efforts are initiated further in advance of service commencement than historically has been the norm. With this observation in mind, SDCP must either: 1) focus RPS contracting efforts on existing renewable generating resources; or 2) accept failure and delay risks associated with new-build renewable projects placed under contract by incorporating reasonable planning reserves to mitigate such risks. SDCP's VAMO allocation elections, however, serve as a mitigating factor when considering long-term RPS compliance risk, as the typical lead time associated with new-build renewable generating projects does not apply to these deliveries, which began in 2022. In the case of SDCP, a balanced approach has been pursued, which has entailed contracting efforts focused on both existing and new renewable generating resources, thereby minimizing, but not eliminating, risks associated with compliance shortfalls. With SDCP's expansion in 2023, resource planning and procurement efforts were focused on addressing known increases in the organization's RPS needs, particularly long-term RPS needs. Prior to its expansion activities,

SDCP expected to have a long-term RPS surplus in CP4. SDCP elected to receive 100 percent of available long-term VAMO allocations, and MO awards, to help satisfy this compliance mandate. With no planned expansions in CP5, SDCP can focus more of its procurement efforts on new renewable generation resources. Regardless of the eventual long-term contracting opportunities that may be pursued by SDCP, the organization intends to pursue contract volumes in sufficient quantity to accommodate one or more project failures amongst SDCP's currently executed contracts and upcoming contract opportunities. SDCP has evaluated volumetric risk (due to project delays and under performance) in its updated risk assessment, as further described below, and has accounted for such impacts within Appendix C.

SDCP also anticipates mitigating supply-side risk by incorporating fixed-volume and index-plus pricing structures amongst its portfolio of RPS supply agreements. These procurement mechanisms serve to mitigate the risk of delivery variability (typically associated with intermittent renewable resources and renewable resources that may be subject to periodic curtailment) and exposure to negative market pricing (which could prompt economic curtailment). Fixed volume arrangements, in particular, also mitigate risk associated with commercial operation delays and facility failure; these structures also provide buyers with financial protections (via penalty payments) for under-delivery (which could be used, as a last resort, to offset compliance penalties in the event that the supplier or SDCP are unable to identify replacement volumes).

As part of SDCP's approach to managing supply-side risk, it has also adopted what it believes to be a CCA best practice related to RPS contracting: structuring solicitations to identify proven renewable generating technologies in prime resource locations to be developed and/or operated by the most experienced available suppliers (with strong, well-documented track

records of successful project completion and operational reliability). When evaluating prospective renewable energy supply opportunities, SDCP will seek to minimize the risk of delivery failure (or shortfalls) by pursuing supply arrangements with such experienced and financially stable suppliers that have demonstrated successful track records. This noted, there is always a possibility that future renewable energy supply will not be delivered as required, which is why SDCP intends to periodically evaluate the sufficiency of currently anticipated renewable energy procurement targets in meeting both statutory mandates and prudent planning reserve levels. Given SDCP's initial commitment to an overall portfolio with a minimum 50 percent renewable content, it seems highly unlikely that cumulative renewable energy delivery shortfalls could result in compliance deficiencies in the near term. While other CCA programs may choose to pursue differing planning reserve targets, SDCP observes that there does not seem to be a clear standard or related guidelines for setting such metrics and believes that its anticipated, internally defined renewable energy targets provide sufficient planning reserves.

Following contract execution, SDCP staff closely coordinate with its suppliers, particularly developers of any new-build resource, to maintain an acute awareness of project development progress, including any anticipated issues that could delay expected initial deliveries or compromise overall project viability. Such communications are intended to provide SDCP with an early indication of such issues, which would allow corrective procurement actions to occur if the extent of such issues were determined to impact SDCP's RPS compliance status.

In terms of system and resource reliability, SDCP has adopted a procurement approach that intends to emphasize resource and contractual diversity. This process is expected to contribute to the identification of renewable generating resources that should positively impact system reliability over time.

SDCP will consider this potential risk of generation variability during its resource planning process and related contracting efforts and may pursue contract structures that promote volumetric stability through the application of firm delivery quantities or performance guarantees that provide financial remedies/penalties in the event of delivery shortfalls. If necessary, the application of such penalties could be used: 1) as a first priority, to procure additional renewable energy supply to address delivery shortfalls; or 2) in the event of a determination of non-compliance, to offset the cost of related penalties. SDCP's intent is to achieve and maintain compliance with applicable RPS mandates, and the latter option is a last resort that is not expected to apply.

In addition to the previously described considerations, SDCP utilizes a quantitative risk assessment that quantifies the energy impacts related to supply side losses. This approach organizes prospective risks into three general categories which pose the greatest supply-side impacts to the delivery of expected RPS energy: 1) curtailment risk; 2) counterparty risk; and 3) project failure risk.

As part of its quantitative risk assessment, SDCP examines hourly forward-looking data that could lead to curtailment risk, specifically the likelihood that an hour within the forward market exhibits negative pricing through the expiration of each contract. Below a certain negative dollar amount, SDCP is presumed to be better off financially if it were to curtail the affected generating unit and, as a substitute for such curtailment, purchase additional renewable energy credits on the open market. Considering SDCP's current long-term renewable energy positions, a reduction in long-term RPS volumes due to curtailment could, potentially, compromise the prospect of RPS compliance. The figures presented in the column quantifying curtailment risk are calculated by quantifying the volume of expected energy deliveries and

multiplying such volume by the likelihood of curtailment. *Based on SDCP's assessment of curtailment risk associated with its renewable energy contract portfolio, this risk category was assigned a rating of low.*

Counterparty risk is the risk posed by a counterparty being unable or unwilling to honor its total RPS delivery obligations, as reflected in related contract documents. SDCP has quantified this likelihood by considering S&P Global's, Global Corporate Annual Default Rates by Rating Category (%) as a measure of organizational viability and financial stability. While this rate considers industries beyond the energy sector, it provides relevant insights into the correlation and potential impacts of dealing with uncreditworthy counterparties. The likelihood of default by credit rating was averaged over the years from 2018 to 2024. The years 2020 and 2021 were excluded to remove irregularities in default rates during the Covid-19 pandemic. If a counterparty was found to be unrated, then the contract was reviewed to identify specified credit assurances; based on such assurances, an approximate rating was derived based on SDCP's experience and risk tolerance. *Based on SDCP's assessment of counterparty risk associated with its renewable energy contract portfolio, this risk category was assigned a rating of low.*

The final category reflected in SDCP's analysis is project failure risk. This category is distinct from counterparty risk because the risk of project failure may only affect a single project under a counterparty's portfolio. Projects may be cancelled for a variety of reasons. This risk only affects single source projects which have yet to be constructed. These projects were chosen because they have a single point of failure unlike RPS energy purchased from a pool of resources. Based on discussions with various counterparties, other load serving entities and its own experience, SDCP has assessed that this risk effects roughly 1 in 20 deals. *Based on SDCP's assessment of project failure risk associated with its renewable energy contract*

portfolio, this risk category was assigned a rating of low.

Considering these categories holistically, SDCP was able to derive a cumulative energy percentage at risk. In consideration of SDCP's relatively conservative risk tolerances, a top-level risk of non-delivery offset at 0.25% of renewable energy procurements was added to the calculated energy at risk percentage. This adder will help to account for risks that SDCP cannot foresee and will help to guarantee the sufficiency of SDCP's planned RPS purchases in meeting both compliance-related and internally adopted renewable energy procurement targets. The percentage of renewable energy is the percentage of total renewable energy procured that was determined to be at risk, while the percentage of retail load is the energy at risk as a percentage of retail load. These "at risk" percentages reflect possible losses which, through no fault of SDCP, may occur by virtue of being a market participant. These losses pose a risk for non-compliance relative to SDCP's RPS goals and targets. Since this number is not a guaranteed loss, SDCP will implement the previously mentioned mitigation strategies to give the greatest chance of meeting its adopted renewable energy procurement targets.

ID	Contract		Energy to be Delivered to Market (MWh)	Curtailment Risk (MWh)	Counterparty Risk (MWh)	Project Cancellation Risk (MWh)
1	Contract 2821		6,638,597	29,874	127,461	-
2	Contract 2964		3,116,004	14,022	59,827	-
3	Contract 3555		24,191,082	108,860	7,257	-
4	Contract 3590		1,298,097	5,841	24,923	-
5	Contract 3973		262,502	-	78,7506	-
6	Contract 4306		5,549,911	24,975	106,558	2,775
7	Contract 4424		686,628	-	206	-
8	Contract 4644		3,310,192	-	993	-
9	Contract 4968		2,954,722	-	886	-
10	Contract 5000		2,223,014	10,004	42,682	1,111.51
11	Contract 5007		39,468	-	12	-
12	Contract 5008		616,737	-	185	-
13	Contract 5009		1,895,864	8,531	36,401	948
14	Contract 5402		9,222,625	41,502	177,074	4,611
15	Contract 5406		7,108,675	31,989	136,487	-
16	Contract 5455		18,126,151	81,568	348,022	9,063
17	Contract 5489		22,875,671	102,941	439,213	22,875.67
18	Contract 5603		4,390	-	1	-
19	Contract 5606		153,225	-	46	-
20	Contract 5607		1,591,005	-	477	-
21	Contract 5612		4,686,845	-	1,406	-
Total			116,551,405	460,106	1,510,198	41,384

Energy

Total Renewable Energy	116,551,405
Total Renewable Energy at Risk	2,011,688
% of Renewable Energy at Risk	1.73%
% of Unknown Error at Risk	0.25%
% of Renewable Energy & Error at Risk	1.98%
% of Retail Load	0.96%

Based on SDCP's analysis, SDCP determined that 1. percent of SDCP's expected future RPS deliveries may be at risk, which equates to 1. percent of SDCP's retail load. These percentages reflect average risk throughout the study period, which suggests that actual risk could fall somewhat above or below these percentages. Regardless, the potential risk-related impacts to SDCP's RPS supply portfolio fall well below VMoP and MMoP reflected in its RPS planning process. *In consideration of the results of SDCP's risk analysis, the composite risk assessment, which considers all three of the previously described risk categories, results in an overall risk rating of low.*

As previously noted, SDCP adopted an ERM Policy at the meeting of its governing board on June 25, 2020. In accordance with SDCP's ERM Policy, these risk analyses are shared and

reviewed with SDCP's ROC. If SDCP's internally adopted planning targets and related procurement efforts prove to be insufficient in meeting near-term RPS compliance targets, SDCP will bring such findings to the attention of its ROC and pursue suitable resolutions and mitigation measures under the oversight of the committee.

SDCP is actively monitoring milestone completion for new-build renewable projects that have yet to achieve commercial operation with the goal of promoting timely project completion and initial deliveries to ensure that SDCP meets applicable compliance mandates during CP5 and beyond. To the extent that SDCP observes issues related to key milestone completion, it will accordingly adjust anticipated renewable energy deliveries to account for the prospect of RPS shortfalls (even though such shortfalls are unlikely to present compliance issues, due to the relatively high renewable energy content reflected in SDCP's default retail service offering).

VII.C Lessons Learned – Risk Assessment

In terms of lessons learned related to risk management, SDCP observes that internally adopted, above-RPS planning targets generally serve as effective mitigation measures related to RPS compliance. This approach seems to be supported by SDCP's low risk categorization from the compliance risk assessment letter from the CPUC, especially given SDCP has since meaningfully increased its RPS procurement via acceptance of its VAMO allocations. SDCP will, however, continue to evaluate the sufficiency of its adopted planning reserves (VMoP and MMoP) to reduce the risk of RPS compliance shortfalls. If future RPS contracting activities impose larger than anticipated risks (on project failure or under-delivery), SDCP may increase its planning reserved to provide additional protection against such risks. The extent to which such adjustments may occur is not known at this time but will be discussed, as necessary, in a future RPS Procurement Plan.

SDCP has also observed the value of resource diversity across a broad spectrum of

considerations, including resource location, generating technology, suppliers/developers and contract structures, amongst other concerns. Long-term renewable supply commitments are inherently risky in the sense that such commitments expose the buyer and seller to a variety of unknown circumstances, including but not limited to evolving market prices and policy changes. Throughout a long-term contract relationship, it seems evident that areas with initially low levels of negative pricing (and related curtailment of energy production) can materially change as new project development activity occurs, creating (or exacerbating) conditions of over-supply and related incidents of energy curtailment. This risk is particularly challenging to manage, as California's escalating RPS procurement mandates necessitate ongoing investment in new renewable generating infrastructure, which is often sited in resource-rich areas that become saturated with similar generating technologies (and related delivery profiles). These circumstances seem inevitable and, over the course of a long-term supply relationship, may expose the contracted parties to unexpected risks, including negative prices (and related budgetary impacts) and curtailed deliveries (which may compromise the fulfillment of mandated procurement targets by the buyer). Again, SDCP will periodically reevaluate its current renewable energy planning reserve to address anticipated curtailment and/or underperformance risk to the extent that such concerns are pertinent to SDCP's renewable contract portfolio.

SDCP is also aware that risk can be diversified through various contract structures. For example, an "index-plus" pricing structure is useful in transferring market price risk to the seller – in such structures, the buyer pays a fixed renewable premium, while the seller assumes risk associated with market price fluctuations but also receives market revenues (which could be higher or lower than anticipated) – even though the buyer receives the energy, renewable attribute, and (in certain instances) capacity value as part of such a transaction, the buyer's

financial risk is generally limited to the payment of the renewable premium. For buyers who are averse to market price risk, the index-plus pricing structure effectively eliminates this concern but may result in higher overall contract costs (which may be acceptable, as a form of insurance, to mitigate market price exposure). In other structures, such as the “fixed-price” structure, the renewable energy premium and energy commodity (and oftentimes, capacity value) are reflected in a single price paid by the buyer – this structure deliberately allocates market price risk to the buyer, but the buyer may also pay a lower imputed renewable premium in instances where market revenues (realized when the energy commodity is delivered to the grid) closely approximates (or exceeds) the aggregate renewable energy price. SDCP has pursued both pricing structures as part of its portfolio diversification and risk management strategies, attempting to balance risk across a broad range of considerations. Any changes to this approach will be articulated in future iterations of the RPS procurement planning process.

VIII. Renewable Net Short Calculations

SDCP has provided a quantitative assessment to support the qualitative descriptions provided in this RPS Procurement Plan, which is attached as Appendix C. At this time and based on SDCP’s initial renewable energy contracting efforts, certain risk-related adjustments have been incorporated in Appendix C, as described above. More specifically, SDCP previously described (above, in Section VII, Risk Assessment) its quantitative risk assessment methodology and the results of such analysis, which suggested that 1.35% of future renewable energy deliveries were at risk, meaning that SDCP reasonably anticipates that this portion of expected renewable energy deliveries will not be received. This determination was based on an assessment of the risk categories reflected in SDCP’s analysis, which included: 1) curtailment risk; 2) counterparty risk; and 3) project failure risk. In an effort to impute further conservatism in its risk management process (to mitigate against the prospect of compliance shortfalls), SDCP

increased the 1.% figure derived through its risk assessment to a full 2.00% delivery failure rate when preparing its Renewable Net Short calculations; this figure can be in rows 14 and 16 of the RNS reporting template. Such an (upward) adjustment was deemed appropriate to insure against unexpected renewable energy delivery shortfalls that could not be reasonably quantified through the aforementioned assessment. Also note that SDCP increased its forecasted failure rate for RPS Facilities in Development to 27% in 2023, an adjustment that was intended to reflect potential operational delays and resultant delivery shortfalls. This adjustment still seems sufficient in 2025. If such adjustments are deemed insufficient in the future, based on regular project development status updates, the results of a future SDCP risk assessment, or other information, SDCP will update such adjustments in a future planning document based on information specifically related to each contracting opportunity subsumed in Appendix C.

Due to SDCP's successful procurement efforts to date, it is now accruing renewable energy quantities in excess of applicable statewide mandates. Renewable suppliers have generally performed as expected, so the noted failure rates that are reflected in C (set at two percent in future years) are in excess of the findings reflected in SDCP's previously described risk assessment, which indicate that 1. percent of such supply may be at risk. If supplier performance becomes more erratic in the future and adjustments to these assumptions are deemed necessary, SDCP will reflect such adjustments in a future planning document.

IX. Minimum Margin of Procurement (MMoP)

IX.A MMoP Level

SDCP is developing an electricity supply portfolio that will further the achievement of state mandates as well as internally adopted goals for increasing RPS-eligible renewable energy supply over time. The following table displays SDCP's intended margin of RPS over-procurement based on the differential between the SB 100 procurement targets and SDCP's

internally adopted RPS procurement targets. These tables reflect SDCP's voluntary margin of over-procurement, or VMoP.

State & Internally Adopted Renewable Energy Requirements

2023-2029

	2023	2024	2025	2026	2027	2028	2029
SB 100 RPS Procurement Requirement (% of Retail Sales)	41.3	44	46.7	49.3	52	54.7	57.3
SDCP's Minimum Internally Adopted RPS Procurement Target	58.3	52	54	58	70	78.3	81.7
SDCPs Voluntary Margin Over- Procurement (% of Retail Sales)	17	8	7.3	8.7	18	23.6	24.4

2030-2035

	2030	2031	2032	2033	2034	2035
SB 100 RPS Procurement Requirement (% of Retail Sales)	60	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS Procurement Target	85	88	91	94	97	100
SDCPs Voluntary Margin Over- Procurement (% of Retail Sales)	25	28	31	34	37	40

As reflected in the previous tables, SDCP's RPS-eligible renewable energy target was set at a minimum 50 percent in 2021, increasing to 70 percent by 2027 and to 100 percent by

2035. SDCP's internally adopted minimum renewable energy procurement goals ensure a significant margin of procurement above the SB 100 mandates. SDCP's internally adopted renewable energy procurement goals provide a meaningful buffer above the state's RPS requirements and serve as SDCP's VMoP – SDCP's VMoP will exceed statewide RPS mandates by at least 8 percent (relative to retail sales), increasing in each year through 2035.

To address RPS compliance risk, SDCP uses its risk assessments, including its renewable net short calculations, to consider a Minimum Margin of Procurement to guide RPS compliance procurement planning. SDCP previously calculated the minimum margin of procurement, or MMoP, using a 10% risk adjustment that was applied to SDCP's minimum internally adopted RPS procurement target, which is reflective of the renewable content offered through SDCP's default retail service offering, PowerOn. Given that the magnitude of VMoP associated with its PowerOn service offering significantly exceeds a potential MMoP, SDCP considers its MMoP to be subsumed within its VMoP. On a voluntary basis, beginning in 2024, SDCP customers may enroll in SDCP's Power100 Green+, a 100% renewable energy service offering that is supplied from Green-E certified resources, SDCP's 100% renewable energy service offering, Power100, or PowerBase, a renewable product offering affordability. Customer participation in either of the Power100 programs increases SDCP's overall renewable energy need but also provides an enhanced procurement buffer relative to applicable compliance mandates. This noted, SDCP does not rely on additional renewable energy volumes required to serve Power100 customers in determining its MMoP or VMoP – such incremental renewable energy purchases are additive to SDCP's MMoP and VMoP (meaning that such volumes are in excess of the additional renewable energy purchases required to meet SDCP's MMoP and VMoP). For Power100 Green+ customers, only the minimum state RPS percentages

may count towards RPS compliance, and are not additive to SDCP's MMoP and VMoP

Based on the manner in which SDCP has established its MMoP, as a 10% planning risk adjustment relative to total renewable energy requirements, the effective MMoP percentages observed by SDCP are approximately 14%-15%, relative to SDCP's projected RPS compliance need, for each year through 2035. The following charts provide additional detail regarding the effective MMoP percentages observed by SDCP.

2023-2029

	2023	2024	2025	2026	2027	2028	2029
SB 100 RPS Procurement Requirement (% of Retail Sales)	41.3	44	46.7	49.3	52	54.7	57.3
SDCP's Minimum Internally Adopted RPS Procurement Target	58.3	52	54	58	70	78.3	81.7
SDCP's RPS Planning Risk Adjustment (at 10% of Minimum Internally Adopted RPS Target)	10	10	10	10	10	10	10
SDCP's Minimum Margin of Over- Procurement (% of Retail Sales)	5.8	5.2	5.4	5.8	7	7.8	8.2
SDCP's Minimum Margin of Over- Procurement (% buffer relative to RPS Mandate)	14.1	11.8	11.6	11.8	13.5	14.3	14.3

2030-2035

	2030	2031	2032	2033	2034	2035
SB 100 RPS Procurement Requirement (% of Retail Sales)	60	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS Procurement Target	85	88	91	94	97	100
SDCP's RPS Planning Risk Adjustment (at 10% of Minimum Internally Adopted RPS Target)	10	10	10	10	10	10
SDCP's Minimum Margin of Over-Procurement (% of Retail Sales)	8.5	8.8	9.1	9.4	9.7	10
SDCP's Minimum Margin of Over-Procurement (% buffer relative to RPS Mandate)	14.2	14.7	15.2	15.7	16.2	16.7

SDCP's MMoP is intended to address potential delivery variability for intermittent resources, curtailment risk, project delays (or failures) and other operational peculiarities that may cause actual renewable energy deliveries to deviate from projections. Note that certain SDCP renewable energy deliveries are not subject to variability – such agreements reflect minimum fixed delivery quantities (or quantities with limited volumetric variability) with corresponding financial penalties (paid to SDCP by related sellers in the event of delivery shortfalls). SDCP has limited exposure to resource intermittency via its long-term renewable supply agreement with Duran Mesa, LLC, Vikings Energy Farm LLC, and IP Oberon LLC. Other sources of exposure will occur as other contracts come online in 2025 and beyond and

have been accounted for in SDCP's previously described risk assessment.

If SDCP adopts changes to its future renewable energy content and service offerings, future RPS procurement planning documents will be updated accordingly. Staff assumes that future renewable procurement targets (inclusive of planning reserves necessary to meet RPS mandates) will consider a variety of factors, including but not limited to: the operational status of prospective renewable energy facilities to be placed under contract; the experience and general development track record of each project development team (associated with new resources); resource size (capacity); the location of prospective generating resources (for new facilities); and, impacts of over-procurement to the CCA program's procurement budget and customer rates – certain of these factors are appropriately considered in SDCP's quantitative risk assessment.

IX.A.1 MMoP Methodology and Inputs

SDCP's MMoP is intended to address an RPS failure rate at or above that which is reflected in the renewable net short reporting template. In the event of contract under-deliveries, commercial operation delays or project failures, the MMoP should be sufficient to ensure SDCP is compliant with the RPS procurement requirements. SDCP's VMoP, which includes its MMoP, is the annual RPS-eligible minimum portfolio content identified in SDCP's internally adopted planning targets.

As discussed in Section VIII, SDCP has incorporated risk adjustments to certain renewable energy delivery estimates associated with existing generating facilities (due to increased fire risk throughout the state of California and the potential for related delivery reductions; delivery intermittency is also subsumed in prescribed risk adjustments) and resources that are under development. Achieving SDCP's VMoP necessitates higher levels of renewable energy procurement for each year through 2035), which accommodate the potential for delivery shortfalls (due to a variety of circumstances) while still allowing SDCP to meet

prescribed RPS mandates. Considered in concert, SDCP's VMoP, which ranges from 8.0% to 40.0% over the planning period, and MMoP provide a substantial aggregate renewable energy planning buffer, relative to applicable compliance mandates, as reflected in the following tables.

2023-2029

	2023	2024	2025	2026	2027	2028	2029
SB 100 RPS Procurement Requirement (% of Retail Sales)	41.3	44	46.7	49.3	52	54.7	57.3
SDCP's Minimum Internally Adopted RPS Procurement Target	58.3	52	54	58	70	78.3	81.7
SDCPs Voluntary Margin Over-Procurement (% of Retail Sales)	17	8	7.3	8.7	18	23.6	24.4
SDCP's Minimum Margin of Over-Procurement (% of Retail Sales)	5.8	5.2	5.4	5.8	7	7.8	8.2
SCDP's Aggregate Margin of Over-Procurement (% of Retail Sales)	22.8	13.2	12.7	14.5	25	31.5	32.5

2030-2035

	2030	2031	2032	2033	2034	2035
SB 100 RPS Procurement Requirement (% of Retail Sales)	60	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS Procurement Target	85	88	91	94	97	100
SDCPs Voluntary Margin Over-Procurement (% of Retail Sales)	25	28	31	34	37	40
SDCP's Minimum Margin of Over-Procurement (% of Retail Sales)	8.5	8.8	9.1	9.4	9.7	10
SCDP's Aggregate Margin of Over-Procurement (% of Retail Sales)	33.5	36.8	40.1	43.4	46.7	50

SDCP will effectively ensure its compliance with applicable RPS mandates by procuring in consideration of internal renewable energy goals that meaningfully exceed state-adopted requirements. SDCP currently provides a minimum 50% renewable energy content target to

most customers as part of its default retail service offering, PowerOn. SDCP's governing board may periodically consider increases to such renewable energy content for purposes of ensuring that SDCP differentiates its supply portfolio from applicable state-mandated renewable content. The extent to which SDCP will exceed statewide RPS mandates will be dependent upon a variety of factors, including RPS product availability, product cost and budgetary impacts and timely product deliveries from generating facilities under contract with SDCP. As SDCP's governing board considers and adopts changes to its internal renewable energy procurement targets, the organization will accordingly update future RPS planning documents to reflect such changes.

IX.A.2 MMoP Scenarios

SDCP plans to meet the annual program renewable goals reflected in the table presented in Section IX (above), including the MMoPs reflected therein. As reflected in this table, SDCP's anticipated MMoP percentages range from 5.2% to 210.0% in 2035. The renewable net short included in the RNS Quantitative Template also incorporates the additional RPS-eligible renewable energy need resulting from SDCP's VMoP, which exceeds SDCP's MMoP and reflects its internally adopted renewable energy procurement goal that increases from 50% in 2022 to 85% in 2030 and 100% in 2035.

During its bid evaluation and supplier selection processes, SDCP considers a variety of risks and will explicitly incorporate such risks into its MMoP calculation after related contracting processes are complete and project development progress (for new-build renewable projects) is being tracked by SDCP staff. Based on the information gathered during SDCP's contract management process (which focuses on key milestone achievement and deviations from initial project development schedules for new-build projects), SDCP may adjust expected renewable energy deliveries. To the extent that adjusted future deliveries meaningfully differ from SDCP's previous expectations, additional RPS procurement may be pursued to ensure that SDCP

maintains its desired MMoP and related minimum customer delivery commitments.

SDCP will also model demand-side sensitivities that may impact MMoP calculations. This will be particularly important during administration of SDCP's expansion activities, as participation rates are expected to be most volatile during such periods of time. In addition to load variability resulting from customer participation levels, SDCP will also monitor electric vehicle ("EV") penetration rates, net energy metering participation rates and other considerations that may impact overall customer energy requirements and related demand-based MMoP calculations.

X. Bid Solicitation Protocol

X.A Bid Selection Protocols

(i) Description of Bid Solicitation Protocols.

Consistent with Public Utilities Code section 399.13(a)(5)(C),²⁴ SDCP shall conduct solicitations for requisite energy resources, including specific needs for eligible renewable energy resources (reflecting locational preferences, when applicable, for such resources), generating capacity, and required online dates to assist in determining what resources fit best within its supply portfolio. Since CCA program governing boards are comprised of local elected officials, these solicitation and procurement decisions are overseen by elected representatives of the community. These solicitation and procurement decisions will seek to comply with targets and preferences that are considerate of local priorities and interests. Any new renewable energy

²⁴ Cal. Pub. Util. Code § 399.13(a)(5)(C) ("Standard terms and conditions to be used by all electrical corporations in contracting for eligible renewable energy resources, including performance requirements for renewable generators. A contract for the purchase of electricity generated by an eligible renewable energy resource, at a minimum, shall include the renewable energy credits associated with all electricity generation specified under the contract. The standard terms and conditions shall include the requirement that, no later than six months after the commission's approval of an electricity purchase agreement entered into pursuant to this article, the following information about the agreement shall be disclosed by the commission: party names, resource type, project location, and project capacity.").

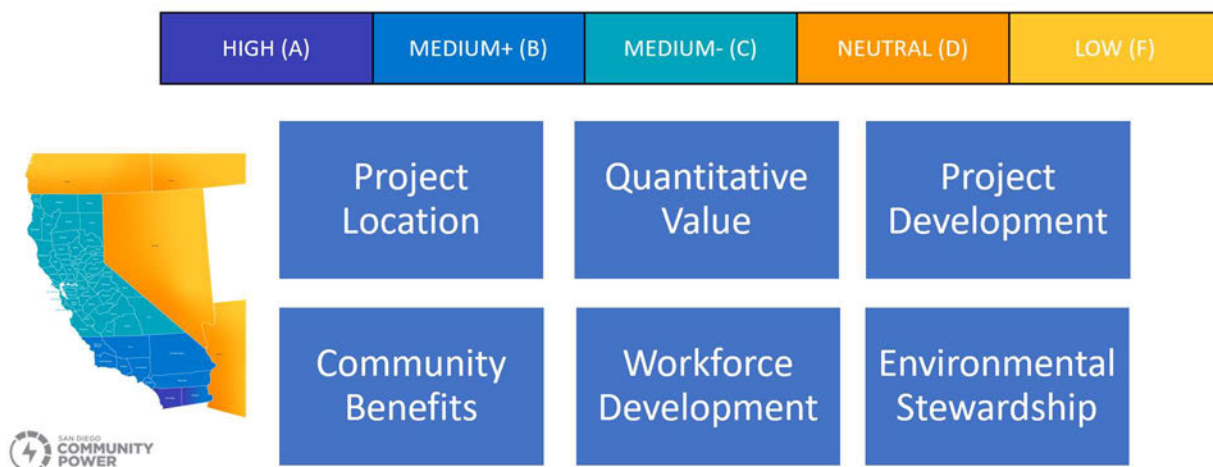
supply agreements resulting from ongoing contract negotiations and future solicitation processes will be brought to SDCP's governing board for approval prior to execution.

Pursuant to Public Utilities Code 399.13(a)(6)(C),²⁵ SDCP's RFPs include a variety of considerations in related bid solicitation protocols as well as the proposal evaluation and selection process, including:

1. Price and relative value within SDCP's supply portfolio;
2. Project location and benefits to the local economy and workforce;
3. Potential economic benefits created within communities with high levels of poverty and unemployment;
4. Project development status, including but not limited to progress toward interconnection, deliverability, siting, zoning, permitting, and financing requirements;
5. Qualifications, experience developing projects in California and/or with CCAs, financial stability, and structure of the prospective project team (including its ownership);
6. Environmental impacts and related mitigation requirements, including impacts to air pollution within communities that have been disproportionately impacted by the existing generating fleet;
7. Potential impacts to grid reliability;
8. Interconnection status, including queue position, full deliverability of Resource Adequacy capacity, and related study completion, if applicable
9. Acceptance of SDCP's standard contract terms; and
10. Development milestone schedule, if applicable.

These criterion are summarized in six categories that are part of SDCP's energy project evaluation criteria. Each project is scored (A to F) on each criteria before review by SDCP's executives and board. A summary of the criteria is below.

²⁵ Cal. Pub. Util. Code § 399.13(a)(6)(C) ("Consistent with the goal of increasing California's reliance on eligible renewable energy resources, the renewable energy procurement plan shall include all of the following: A bid solicitation setting forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any.").



SDCP’s Inclusive and Sustainable Workforce Policy, adopted January 28, 2021, considers impacts to the local economy and workforce. SDCP will specifically consider “the employment growth associated with the construction and operation of eligible renewable energy resources.”²⁶ More specifically, to the extent SDCP procures new RPS resources in solicitations where qualitative factors are considered, SDCP will include a qualitative assessment of the extent to which proposed project development activities will support this goal. Such determinations will be based on information provided by the prospective supplier and SDCP’s independent assessment of such information. When SDCP procures RPS resources, it will request bidders to submit information on projected California employment growth during construction and operation. This data will include the expected number of hires, duration of hire, and an indication of whether the bidder has entered into Project Labor Agreements or Maintenance Labor Agreements in California for the proposed project.

Pursuant to Public Utilities Code section 366.2(m), Community Choice Aggregators like SDCP are required to annually submit a report to the CPUC, which provides a (1) detailed and

²⁶ See *Inclusive and Sustainable Workforce Policy*, adopted January 28, 2021, available at <https://sdcommunitypower.org/resources/meeting-notes/>.

verifiable plan for increasing procurement from small, local, and diverse business enterprises; and (2) a report regarding its procurement from women, minority, disabled veteran, and LGBT business enterprises.²⁷ On March 1, 2025, SDCP submitted its *Supplier Diversity 2024 Annual Report and 2025 Annual Plan* to the Commission in compliance with SB 255 and CPUC General Order (GO) 156.²⁸ As outlined in its most recent report and plan, SDCP continues to build its Supplier Diversity program which aims to support, to the extent applicable by law, the principles of the CPUC GO 156 by increasing the number of diverse suppliers, including power providers, to SDCP.²⁹ SDCP maintains a dedicated webpage to promote its Supplier Diversity program, encourage participation, and provide resources for vendors and suppliers.³⁰

(ii) Consideration of Resources Located in Disadvantaged Communities.

Pursuant to Public Utilities Code section 399.13(a)(8)(A), SDCP will also consider the inclusion of evaluative preference for “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 greenhouse gases.”³¹ To the extent that SDCP procures RPS resources through solicitations where qualitative factors are considered, impact on disadvantaged communities will be considered.

²⁷ See *Supplier Diversity* at <https://www.cpuc.ca.gov/supplierdiversity/>.

²⁸ See [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/bco/cca-procurement-reports/2024/sdcp_go-156_2024-annual-report-and-2025-annual-plan-\(002\).pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/bco/cca-procurement-reports/2024/sdcp_go-156_2024-annual-report-and-2025-annual-plan-(002).pdf).

²⁹ See Section 11, Page 23 at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/bco/go-156-d22-04-035.pdf>.

³⁰ See *Supplier Diversity* at <https://sdcommunitypower.org/supplier-diversity/>.

³¹ Cal. Pub. Util. Code § 399.13(a)(8)(A) (“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 greenhouse gases.”).

(iii) Alignment of Bid Selection Criteria with RPS Procurement Plan.

SDCP's bid solicitation criteria align with all sections of its RPS plan, especially regarding its stated needs, goals, and preferences. Past and planned solicitations are consistent with the portfolio supply and demand assessment provided in RPS Plan Section IV and SDCP's renewable net short position in Section VIII.

(iv) Description of Ongoing, Planned, and Proposed Solicitations

SDCP's most recent RPS solicitations, RFO for Clean-Firm Resources, Second RFO for Solar Advantage (Disadvantaged Communities Green Tariff), and rolling Local Renewable Energy and Energy Storage RFI, can be found at <https://sdcommunitypower.org/resources/solicitations/>. All past solicitations can also be reviewed on that same webpage. SDCP is waiting to see where federal legislation ends up on the ITC, PTC, and tariffs before planning any additional RPS solicitations.

X.B. Solicitation Protocols for Renewables Sales

SDCP does not have immediate plans to issue a solicitation for sales of renewable energy products. If such a need arises in the future, however, SDCP will consider a protocol that: 1) ensures that SDCP remains compliant with applicable RPS procurement mandates; 2) minimizes overall portfolio costs to the greatest extent practical; and 3) provides sufficient flexibility to accommodate reasonably anticipated supply-side and demand-side changes that could impact SDCP's overall renewable energy requirements.

X.C. LCBF Criteria

The Least-Cost Best Fit methodologies approved by the Commission pursuant to D.04-07-029, D.11-04-030, D.12-11-016, D.14-11-042, and D.16-12-044 are expressly only directly applicable to the IOUs and the Commission does not have jurisdiction over the solicitation protocols of CCAs. However, consistent with Public Utilities Code sections

399.13(a)(9), SDCP will consider best-fit attributes that support a balanced mix of resources to help support reliability of the electrical grid.⁴⁰

In particular, SDCP considers “least cost best fit” (“LCBF”) during the evaluation of responses to all of its renewable energy solicitations and will continue to do so in future solicitations. From SDCP’s perspective, use of the term “costs” appropriately includes considerations beyond the basic price of renewable energy. More specifically, costs include a broad range of considerations, such as: 1) reputational damage resulting from failure to meet state-mandated and/or internally established renewable energy procurement targets; 2) compliance penalties resulting from failed project development efforts or delivery shortfalls; 3) administrative complexities related to dealing with inexperienced suppliers (such as prolonged contract negotiation processes and uncertainties related to project milestone timing and achievement); and 4) impacts to planning certainty resulting from higher risk projects. These factors, as well as various others, will continue to be considered by SDCP as components of its cost evaluation process, which may lead to the selection of offers that aren’t necessarily the lowest cost option(s), as expressed on a dollar-per-MWh basis. With regard to “fit,” this aspect of a prospective supply opportunity has as much to do with compatibility (between SDCP and its suppliers) and alignment with key local objectives as it does with balancing customer usage and expected project deliveries, particularly when considering long-term contracting opportunities that will necessitate a constructive working relationship over a period of ten years or more. SDCP also interprets the term “fit” to mean the general suitability of a project opportunity in promoting grid reliability – while SDCP has no explicit operational or maintenance

⁴⁰ Cal. Pub. Util. Code § 399.13(a)(9) (“In soliciting and procuring eligible renewable energy resources, each retail seller shall consider the best-fit attributes of resource types that ensure a balanced resource mix to maintain the reliability of the electrical grid.”).

responsibilities related to the local distribution system serving its customers or the bulk electric system at large, it is aware of the profound importance of supporting grid reliability through its procurement processes. With this in mind, SDCP will make best efforts to balance the demands of California's rigorous RPS compliance mandates and its interest in promoting such reliability. This is no small task, and SDCP expects that considerations related to grid reliability will be incorporated at each stage of its planning and procurement processes but also acknowledges that the full scope of its RPS contract/resource portfolio (including related impacts to grid reliability) will significantly evolve throughout the organizations operating history. Over time, SDCP expects to thoughtfully assemble a diversified portfolio of RPS contracts/resources that will not only contribute to SDCP's achievement of applicable compliance mandates but also to improved stability and reliability of California's electric system. As such, SDCP's LCBF methodology will consider a broad range of components, including those previously noted, balancing a variety of pertinent considerations at the time each renewable purchase opportunity is being evaluated.

Additionally, the requirement of Section 399.13(a)(8)(A) to give preference to renewable projects located in certain communities is expressly only applicable to "electrical corporations" and is not mandatory for CCAs.⁴¹ However, SDCP recognizes the need to help mitigate the impacts of air pollution in regions of the state where communities have been disproportionately impacted by the existing generating fleet as well as the need to bring economic benefits to communities with high levels of poverty and unemployment. Consistent with this recognition, SDCP will consider the manner in which air pollution may

⁴¹ Cal. Pub. Util. Code § 399.13(a)(8)(A) ("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 greenhouse gases.").

be impacted during its renewable energy solicitation process(es) and related project selection.

XI. Safety Considerations

San Diego Community Power holds safety as a top priority. Since SDCP does not own, operate, or control generation facilities, SDCP's procurement of renewable resources will not present any unique safety risks. This section describes how SDCP has taken actions to reduce the safety risks that may be posed by its renewable resource portfolio and how SDCP supports the state's environmental, safety, and energy policy goals.

In its procurement efforts, SDCP's standard contracts include requirements for sellers to comply with all laws and prudent operating practices relating to the operation and maintenance of the renewable facility and the generation and sale of the renewable product. Additionally, the seller shall take all reasonable safety precautions with respect to the operation, maintenance, repair and replacement of the facility, and notify SDCP if seller becomes aware of any circumstances relating to the facility that creates an imminent risk of damage or injury to any person or any person's property, taking prompt, reasonable action to prevent such damage or injury.

The recent incidences of battery energy storage fires have increased the industry's attention to battery safety. While the fires at Moss Landing and Gateway Energy Storage differ either in battery chemistry or configuration (non-containerized) from battery storage contracted under SDCP's long-term portfolio, SDCP closely tracks any efforts by municipalities in its jurisdiction to enact additional safety measures for battery energy storage and supports the adoption of battery storage system development and siting guidelines that underscore public safety and community impact. Additionally, SDCP is contracting with battery storage engineering firms to help inform SDCP's future contracting requirements with respect to battery

operations and safety, including monitoring requirements and enforcement.

In addition, SDCP has provided additional information below on its existing safety practices.

XI.1 Wildfire Risks and Vegetation Management

In ongoing and future negotiations, SDCP will ensure that its contracts with renewable generating facilities will require the facility operator to comply with all relevant safety requirements. This will be accomplished, in part, through contract provisions that require the counterparty to operate and maintain the facility in compliance with all relevant laws and prudent operating practices, including relevant safety and environmental protection standards.

At this time, SDCP has yet to adopt specific procurement policies or preferences focused on the acquisition of forest biomass resources. SDCP is aware of the mitigating impacts that biomass generators, which use forestry waste as feedstock, may have on wildfire risk and will consider the adoption of a related procurement policy in the future.

One of the evaluative criteria considered by SDCP is project location. Part of this evaluation will include an analysis of project location with respect to wildfire risk. Projects that are sited in a high wildfire risk area may be scored lower, and the expected output associated with such project(s) may be reduced to account for potential reductions in output that may occur if fires happen to compromise the project or surrounding infrastructure. SDCP is aware of instances when CCAs have received lower-than-expected deliveries from renewable generating facilities that were required to shut down or reduce output when fire risk compromised such electrical infrastructure. Based on this information, generating assets located in areas that are historically prone to fire risk will need to be considered in light of the potential for reduced output and resultant impacts to SDCP's RPS compliance standing.

XI.2 Decommissioning Facilities

As SDCP continues to complete long-term contracting efforts, it has not developed any plans or requirements related to the disposition of associated generating facilities following completion of applicable delivery terms. However, the developer's plan for decommissioning factors into the qualitative assessment. Further, in contract negotiations, SDCP evaluates, if provided, a project safety plan or a similar type of reporting document, which will include information on procedures for identifying and remediating safety incidents, as well as describing any relevant requirements (such as those associated with the permitting of the facility) for the decommissioning of the facility.

XI.3 Climate Change Adaptation

SDCP's internally adopted portfolio targets, relating to the use of renewable energy and other carbon-free energy supply, are intended to support the CAPs of Member Agencies and the San Diego Region at large. In future solicitations, SDCP will consider updating its bid evaluation criteria in consideration of the policies and preferences of its membership, including but not limited to risks associated with facilities located in regions that are forecasted to be impacted by higher instances of sea-level rise, flooding, wildfires, and/or elevated temperatures.

XI.4 Impacts During Public Safety Shut-off (PSPS) Events

Potential impacts related to PSPS events are uncertain. However, regarding resource planning, it is likely that a relatively short-duration PSPS event impacting SDCP (in which it would be in close coordination with SDG&E) would marginally reduce retail electric sales and, as a result, would generate a very small increase in the proportionate share of renewable energy supply accruing to SDCP (if renewable supply agreements continue to perform as expected during such events). As SDCP executes contracts with renewable generating facilities, it will evaluate the risk of the loss of generation associated with PSPS events both for facilities that are

already online and for facilities that are still under development. Based on impact of prior PSPS events to generating facilities, SDCP anticipates that the total quantity of any PSPS-related reductions in RPS-eligible generation will be relatively small and would likely be offset by the potential reduction in retail sales that would result from PSPS events that directly impact SDCP's customers. Therefore, the likelihood of a material impact to SDCP's renewable energy planning process or related performance metrics seems unlikely.

XI.5 Biomass Procurement

SDCP's neutral position on biomass procurement remains unchanged. While SDCP has no specific preferences for or against biomass resources, the prospect of procuring such resources will be dependent upon offers received during future solicitation processes. SDCP has executed a 5-year deal with an existing biomass facility. SDCP also issued a second Clean-Firm RFO on May 9, 2025. However, SDCP did not receive any conforming bids. This is likely due to the limited available projects and delays in interconnection queues. There is a limited pool of projects that are available with commercial operations planned by 2028-2031. To the extent that future biomass offers are competitive (with similar offers received from other resource types) or in the event SDCP adopts policies explicitly supporting the acquisition of biomass energy resources, SDCP will consider the inclusion of biomass energy within its renewable energy supply portfolio.

XII. Consideration of Price Adjustments Mechanisms

During ongoing contracting processes and future solicitations, and consistent with SB 350 and SB 100, SDCP will review the prospects of incorporating price adjustments in contracts with online dates more than 24 months after the date of contract execution. As noted in the ACR, such price adjustments could include price indexing to key components or to the Consumer Price Index.

XIII. Cost Quantification

SDCP has updated its Cost Quantification Table, Appendix E, based on current renewable energy supply contracts and has extended the planning period reflected in this appendix through 2035. SDCP will continue to update such information in future RPS procurement planning documents when new data points become available.

XIV. Impact of Transmission and Interconnection Delays

SB 1174 (stats. 2022, ch. 229) requires electrical corporations that own transmission lines to report to the Commission on the development of transmission and interconnection facilities necessary to provide transmission deliverability for renewable energy and/or energy storage facilities that have executed interconnection agreements. SDCP is not subject to the requirements of SB 1174 and does not own any transmission lines. Accordingly, SDCP has not included a Transmission/Interconnection Delay Data Report as an attachment to this RPS Procurement Plan. However, SDCP has contracts with RPS-eligible projects in development that are dependent on transmission line upgrades, and urges the IOUs and the Commission to prioritize network upgrades to avoid any further delays to renewable energy facility construction.

Dated: June 30, 2025

Respectfully submitted,


Karin Burns (Jun 25, 2025 17:09 PDT)

Karin Burns
Chief Executive Officer
San Diego Community Power
P.O. Box 12716
San Diego, CA 92101
(619) 657-0060

Appendix A

Redlined Version of Draft 2025 RPS Plan

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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

Rulemaking 24-01-017
(Filed January 25, 2024)

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**DRAFT ~~2025~~2024 RENEWABLES PORTFOLIO STANDARD
PROCUREMENT PLAN OF SAN DIEGO COMMUNITY POWER**

PUBLIC VERSION

Karin Burns
Chief Executive Officer
San Diego Community Power
P.O. Box 12716
San Diego, CA 92101
(619) 657-0060
kburns@sdcommunitypower.org

Dated: ~~June 30, 2025~~July 23, 2024

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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

Rulemaking 24-01-017
(Filed January 25, 2024)

**DRAFT ~~2025~~2024 RENEWABLES PORTFOLIO STANDARD
PROCUREMENT PLAN OF SAN DIEGO COMMUNITY POWER
PUBLIC VERSION**

In accordance with the California Public Utilities Commission’s (“Commission”) [April 17, 2025](#)~~May 17, 2024~~ *Assigned Commissioner and Assigned Administrative Law Judge’s*² *Ruling Identifying Issues and Schedule of Review for ~~2025~~2024 Renewables Portfolio Standard Procurement Plans* (“ACR”), San Diego Community Power (“SDCP”) hereby submits its Draft ~~2025~~2024 Renewables Portfolio Standard Procurement Plan (“RPS Procurement Plan”). This RPS Procurement Plan includes responses to the issues listed in sections 6.1-[6.15](#)~~6.17~~ of the ACR.

SDCP notes that certain issues and requests in these ACR sections apply to other retail sellers (electrical corporations and electric service providers) and do not extend to Community Choice Aggregators (“CCAs”). SDCP is nevertheless voluntarily responding to these ACR sections in the interest of transparency and to collaborate with the Commission. The submission of this RPS Procurement Plan pursuant to the ACR, however, should not be construed as a waiver of the right to assert that components of Senate Bill (“SB”) 350, or Commission decisions and rulings on RPS Procurement Plan submittals, do not extend to CCAs, and SDCP reserves the right to challenge any such assertion of jurisdiction over these matters.

I. Summary of Major Changes to RPS Plan

This Section describes the most significant changes between SDCP's Final ~~2024~~~~2023~~ RPS Procurement Plan and its Draft ~~2025~~~~2024~~ RPS Procurement Plan. A redline of this Draft ~~2025~~~~2024~~ RPS Procurement Plan against SDCP's Final ~~2024~~~~2023~~ RPS Procurement Plan is included as Appendix A. The table below provides a list of key differences between SDCP's ~~2024~~~~2023~~ RPS Procurement Plan and ~~2025~~~~this Draft~~~~2024~~ RPS Procurement Plan:

Plan Reference	Plan Section	Summary/Justification of Change
RPS Procurement Plan: Section II	Executive Summary	Updated to reflect the changes made throughout other sections of this RPS Plan.
RPS Procurement Plan: Section IV. A B .1	Long-Term Procurement	Updated with relevant supporting information on how SDCP's ongoing procurement efforts are expected to meet the requirements of SB 350's long-term contracting for Compliance Period 4 (2021-2024) and beyond.
RPS Procurement Plan: Section V	Project Development Status Update	Updated Appendix D to reflect the current status of SDCP's new-build renewable generating projects.
RPS Procurement Plan: Section VIII	Renewable Net Short Calculation	Updated Appendix C to reflect recent ongoing procurement efforts and prescribed changes to the planning period, which now extends through 2035 2034 .
RPS Procurement Plan: Section XII III V	Cost Quantification	Updated Appendix E to reflect ongoing procurement efforts and prescribed changes to the planning period, which now extends through 2035 2034 .

SDCP timely commenced CCA service in March 2021 – such timing was consistent with information reflected in SDCP's Community Choice Aggregation Plan and Statement of Intent ("CCA Implementation Plan"), which was electronically served on all parties of record in proceedings R.17-09-020, R.16-02-007, and R.03-10-003 on December 9, 2019 and

subsequently certified by the Commission on March 9, 2020. Customer phase-in activities were completed in 2023. Based on current load and customer forecasts, ~~which now include assumptions related to expansion activities in 2023,~~ SDCP plans to serve more than ~~930,000~~957,171 service accounts located within the cities of Chula Vista, Encinitas, Imperial Beach, La Mesa, National City and San Diego as well as the unincorporated areas of San Diego County (together, the “Member Agencies”), which are expected to continue consuming approximately ~~8,400~~87,0300 GWh per year ~~following with completion of all customer phase-in activities in 2023.~~

II. Executive Summary Key Issues

San Diego Community Power is a CCA program that commenced retail electric service in March 2021 to certain customers located within the cities of San Diego, Encinitas, La Mesa, Chula Vista, and Imperial Beach. SDCP was formed when these five Member Agencies created a Joint Powers Authority, effective October 1, 2019.¹ SDCP submitted its CCA Implementation Plan, which was certified by the Commission on March 9, 2020, to address the anticipated consequences of CCA formation.² Since it commenced service in March 2021, SDCP successfully completed planned phase-in activities, which have increased the number of customer accounts as well as related retail electric energy requirements. As reflected in Appendix C, actual retail electricity sales in 2021 approximated 2,047,877 MWh and increased by approximately 175% to 5,624,296 MWh in 2022. ~~At~~By the end of 2023, SDCP ~~is~~was serving nearly 940,000 customer accounts across all account classes.

¹ See *Joint Powers Agreement*, San Diego Regional Community Choice Energy Authority, October 1, 2019, available at https://www.sandiego.gov/sites/default/files/sdrcea_jpa_agreement_signed_0.pdf.

² See *Letter Certifying San Diego Community Power’s Implementation Plan and Statement of Intent*, California Public Utilities Commission, March 9, 2020.

In November 2021, SDCP's Governing Board approved submittal of Addendum No. 1 to the Community Choice Aggregation Implementation Plan and Statement of Intent to Address Expansion to the City of National City and the unincorporated areas of San Diego County ("Addendum No. 1"); Addendum No. 1 was subsequently submitted to the Commission on December 22, 2021 and was also served to parties of record in proceedings R.-03-10-003, R.20-05-003, R.19-11-009, and R.21-10-002 on that day. Addendum No. 1 was later certified by the CPUC's Energy Division on February 28, 2022. As the document's title suggests, Addendum No. 1 addressed the expansion of SDCP's service territory to include the noted municipalities with related customer service that commenced in April 2023. The increases in retail sales and related RPS purchases, and procurement obligations associated with this expansion, are reflected in SDCP's RPS planning and procurement processes, as well as in Appendix C of this Plan.

At launch, SDCP's governing board approved a procurement target for a minimum 50 percent renewable energy supply portfolio. Initially, SDCP offered its customer two retail service offerings: (1) "PowerOn" that had a minimum 50 percent renewable energy supply ramping up to 100% by 2035, and (2) "Power100" a 100 percent renewable retail service option available on a voluntary basis. ~~Beginning in~~ In July 2024, SDCP ~~will offer~~ began offering "Power100 Green+", a 100% renewable energy service offering that is supplied from Green-E certified resources, and "PowerBase", a lower renewable content product than "PowerOn" (but still above annual RPS compliance requirements) that provides customers with a more affordable option. Since SDCP is a relatively new CCA, and most of its long-term renewable energy contracts are not yet operational, PowerBase ~~will help~~ ed shield price-sensitive customers from the volatility of short-term renewable energy prices as Compliance Period 4 ~~came~~ comes to an end.

The minimum quantity of renewable energy delivered to SDCP customers is expected to increase over time, moving to 85~~percent~~% by 2030 and 100% by 2035, as reflected elsewhere in this document and its appendices. During its renewable energy procurement efforts, SDCP has focused exclusively on Portfolio Content Category (“PCC”) 1 and 2 product types (with a strong preference for PCC1 products).³ This considerable commitment to renewable energy procurement is expected to result in meaningful planning reserves, which will provide compliance buffers in the event that contracted renewable energy purchases are not fulfilled as expected – this topic is further discussed in relation to SDCP’s adopted voluntary margin of over-procurement (“VMoP”), which exceeds SDCP’s Minimum Margin of Procurement (“MMoP”). SDCP’s internally adopted renewable energy procurement goals provide a meaningful buffer above the state’s RPS requirements and serve as VMoP, which will exceed statewide RPS mandates by more than 10% of each year’s RPS requirement, in each year of the planning period, which now extends through 2034. Considered in concert, SDCP’s VMoP and MMoP provide a substantial aggregate renewable energy planning buffer, virtually eliminating the possibility of compliance shortfalls during continued SDCP operation.

SDCP also acknowledges that its renewable energy targets and related planning reserves could be periodically evaluated and adjusted by its governing board – such a determination could be based on: the manner in which actual renewable energy purchases/deliveries relate to applicable mandates and internally adopted targets; project development progress for new-build renewable generating facilities; generalized renewable product availability; the extent to which

³ See *San Diego Community Power Community Choice Aggregation Implementation Plan and Statement of Intent*, December 9, 2019, available at <http://sdcommunitypower.org/resources/key-documents/>.

RPS deliveries under the Voluntary Auction – Market Offer (“VAMO”) allocations and contracts conform with related projections; load variability that may occur during customer enrollment periods; budgetary impacts; or various other considerations.

Reducing electric utility sector greenhouse gas (“GHG”) emissions generated by residents and businesses within SDCP’s Member Agencies was a driving factor in the formation of SDCP. Climate Action Plans (“CAP”) adopted by SDCP’s Member Agencies establish a variety of GHG reduction and clean energy goals within their respective jurisdictions as detailed in Section IV.~~CB.(CB.2(ii))~~ (below). The Member Agencies intend to contribute to achieving their CAP goals collaboratively by operating SDCP to provide electric energy to residential, ~~commercial~~commercial, and governmental electric accounts located within their communities.

SDCP’s negotiation efforts have resulted in the execution of ~~thirteen~~fourteen unique long-term PCC1 supply agreements thus far, which are described further in Section IV.A.1(iii).~~include:~~

~~1) a long term (20 year) PCC1 supply agreement with Vikings Energy Farm, LLC, executed on May 3, 2021, which will cause the delivery of approximately 250,000 MWh per year of renewable energy produced by a new 136.8 megawatt photovoltaic solar array (plus battery storage) located in Imperial County that is expected to commence commercial operation in September 2024;~~

~~2) a long term (20 year) PCC1 supply agreement with JVR Energy Park, LLC, executed on June 4, 2021, which will cause the delivery of approximately 260,000 MWh per year of renewable energy produced by a new 90 megawatt photovoltaic solar array (plus battery storage) located in San Diego County that is expected to commence commercial operation in October 2026;~~

~~3) a long-term (15-year) PCC1 supply agreement with IP Oberon, LLC, executed on June 11, 2021, which will cause the delivery of approximately 225,000 MWh per year of renewable energy produced by a new 75 megawatt photovoltaic solar array located in Riverside County that commenced commercial operation in July 2023;~~

~~4) a long-term (10-year) PCC1 supply agreement with Duran Mesa LLC, executed January 27, 2022, which will cause the delivery of approximately 170,000 MWh per year of renewable energy produced by 50 MW of new wind capacity located in Torrance County, New Mexico that achieved commercial operation (on November 30, 2021, as reflected in the California Energy Commission's associated certificate for this project) and began delivering power to SDCP on February 1, 2022;~~

~~5) a long-term (5-year) PCC1 supply agreement with Pacific Gas and Electric Company, executed on September 30, 2022, for an existing 29 megawatt biomass renewable generation facility located in Burney, CA that is on-line;~~

~~6) a long-term (20-year) PCC1 supply agreement with Orni 30 LLC, executed on June 29, 2023, for a new 42 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Imperial County that is expected to commence commercial operation in April 2025;~~

~~7) a long-term (20-year) PCC1 supply agreement with Yellow Pine Solar III, LLC, executed on July 3, 2023, for a new 35 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in October 2025;~~

~~8) a long-term (20-year) PCC1 supply agreement with Vidal Solar, LLC, executed on Jan 2, 2024, for a new 160 megawatt photovoltaic solar array (plus 160 MW battery storage) located in San Bernardino county that is expected to commence commercial operation in March 2026;~~

~~9) a long-term (15-year) PCC1 supply agreement with SunZia Wind PowerCo LLC, executed on November 7, 2023, for a new 150 megawatt wind generation facility located in New Mexico that is expected to commence commercial operation in March 2027;~~

~~10) a long-term (15-year) PCC1 supply agreement with Pelicans Jaw Solar, LLC, executed on May 1, 2024, for a new 440 megawatt photovoltaic solar array (plus 238.5 MW battery storage) located in Kern county that is expected to commence commercial operation in April 2027; and~~

~~11) a long-term (20-year) PCC1 supply agreement with Nobel Solar, LLC, executed on March 15, 2024, for a new 400 megawatt photovoltaic solar array (plus 400 MW battery storage) located in Clark county, Nevada that is expected to commence commercial operation in June 2027.~~

~~12) a long-term (20-year) PCC1 Market Offer award with PG&E (deliveries from 2023–2043); and~~

~~13) a long-term (17-year) PCC1 Market Offer award with SDG&E (deliveries from 2023–2040).~~

SDCP ~~has~~ issued long-term RPS solicitations in 2020, ~~in~~^{of} the fourth quarter of 2022, ~~and in~~ the first quarter of 2023, and in the fourth quarter of 2024 resulting in substantial interest from qualified suppliers of renewable products, as well as stand-alone storage projects. These solicitations led to many of the unique long-term PCC1 supply agreements listed above.

SDCP also completed bilateral negotiations of a long-term contract for bundled renewable energy supply from San Diego Gas & Electric (“SDG&E”), the incumbent IOU, and its portfolio of long-term renewable energy contracts. The unique structure of this contract allowed it to serve as a vehicle via which SDCP could purchase from SDG&E its elected

allocation of bundled, long-term renewable energy; that is, the contract originally set a baseline annual volume of bundled, renewable deliveries between 2022 and 2033, which has since been adjusted to reflect SDCP's allocation volume as determined through the VAMO mechanism. SDG&E filed the resulting contract for Commission approval in SDG&E AL 3936-E, which was subsequently received on May 19, 2022. This agreement meaningfully ~~increased~~increased SDCP's long-term PCC1 position in Compliance Period 4 ("CP4", 2021-2024) and beyond. In addition, SDCP participated in the Long-term and Short-term Market Offer ("MO") process of the three IOUs in 2023. SDCP was awarded a Long-term and a Short-term allocation of the remaining Long-term Portfolios of both SDG&E and PG&E. Deliveries of long-term and short-term allocations of PG&E's Long-term portfolio began in 2023; Short-term deliveries of the Long-term portfolio from SDG&E's Market Offer began in 2023, while the long-term deliveries of the Long-term portfolio began in 2024.

To encourage local development of renewable energy and carbon-free~~free~~ energy storage projects and to inform upcoming solicitations by better understanding current opportunities for contracting such facilities, SDCP issued a Request for Information for Local Renewable Energy and Energy Storage ("Local RFI") in August 2021. The RFI was updated in early 2023 to extend the eligibility of commercial operation dates through 2027. The Local RFI is a rolling RFI accepting applications for review year-round. SDCP is evaluating proposals and negotiating power purchase agreements with multiple prospective long-term PCC1 suppliers. Because such contracting opportunities remain under negotiation and are confidential, SDCP is unable to further elaborate until these contracts have been finalized, approved and executed.

On October 25, 2023, SDCP released an RFO for distributed renewable energy resources (DERs) which focuses on a broad range of distribution-level renewable projects within San

Diego County. SDCP staff have reviewed proposals, notified shortlisted participants, and are negotiating several contracts. [One contract has been executed for a distributed energy solar resource.](#)

To further encourage local development, SDCP is also implementing solicitations for the Disadvantaged Communities - Green Tariff (“DAC-GT”) and Community Solar Green Tariff (“CSGT”). On September 29, 2021, SDCP filed its Tier 2 Advice Letter (“AL”) with the Commission requesting a capacity transfer from SDG&E under the DAC-GT and CSGT based on the disadvantaged communities located within founding member agencies of SDCP. The Commission accepted and approved SDCP’s capacity transfer request on October 29, 2021. SDCP submitted its implementation advice letter on October 12, 2022, seeking approval of the proposed programs and obtaining the status of a program administrator (“PA”). As part of the implementation advice letter, SDCP sought additional capacity transfer from disadvantaged communities located in National City, a new member city that was added to SDCP’s joint powers authority (“JPA”) after SDCP submitted AL 4-E.

On March 16, 2023, the California Public Utilities Commission (“CPUC”) voted to adopt Resolution E-5246 on SDCP's DAC-GT and CSGT Implementation AL. As noted in the regulatory and legislative staff report for the February 2023 meeting of the Board of Directors Resolution approves SDCP’s Tier 3 Implementation Advice Letter to become a PA of the DAC-GT and CSGT programs and the additional allocation of 15.78 MW for DAC-GT and 4.38 MW, adjusted for National City. SDCP did not include the General Cost Delta or 20% Bill Discount in the Program Year (“PY”) 2023 to 2024 Budget Forecast, due to a lack of eligible interim resources. As a result, SDCP will auto-enroll customers when new projects come online, potentially as soon as 202~~7~~⁵.

On May 19, 2023, SDCP submitted a Tier 2 AL 13-E, seeking CPUC approval for SDCP's DAC-GT and CSGT solicitation materials. The DAC-GT and CSGT solicitation documents include the Request for Offer (RFO) Protocol, Term Sheet, and [the](#) Generation Offer Form. The Commission approved the material in June 2023 and SDCP released the DAC-GT and CSGT solicitation documents [on](#) August 25, 2023.

SDCP expects to administer other solicitations for short- and long-term renewable energy supply, as well as other procurement activities, that will be necessary to meet its adopted portfolio objectives. Completed and upcoming renewable energy planning and procurement activities administered by SDCP include the following:

1. COMPLETE – approval of SDCP's Feed-In Tariff Program ("FIT") was received and this program is now active. SDCP's FIT program is expected to support ~~locally situated~~[locally situated](#), small-scale RPS-eligible renewable energy projects, which will marginally increase long-term PCC1 supply while supporting local economic development activity and workforce utilization. Additional detail regarding SDCP's FIT program is available via the following link:

<https://sdcommunitypower.org/programs/feed-in-tariff/>;

- ~~2.~~ COMPLETE – SDCP participated in the joint IOU Market-Offer process and was awarded short-term and long-term portions of SDG&E and PG&E's Long-term Portfolio.

[2.](#)

- ~~3.~~ COMPLETE - SDCP released a targeted solicitation for long-term, new-build supply from "clean firm" renewable energy sources in Q2 2022, which SDCP staff expect to be fueled by geothermal or bioenergy renewable energy, to be

online by 2026 to meet the relevant requirements within the CPUC's Mid-Term Reliability ("MTR") procurement order. The MTR order has now extended this target to 2028. SDCP ~~expects to launch~~ed another RFO for such resources in ~~2024~~April 2025.

3. COMPLETE - SDCP released a targeted solicitation for long-term, new-build supply from "clean firm" renewable energy sources in Q2 2022, which SDCP staff expect to be fueled by geothermal or bioenergy renewable energy, to be online by 2026 to meet the relevant requirements within the CPUC's Mid-Term Reliability ("MTR") procurement order. The MTR order has now extended this target to 2028. SDCP launched another RFO for such resources in April 2025.
4. COMPLETE – SDCP released a 2022 RFP for Long-term California RPS-Eligible Energy in October 2022, for deliveries commencing prior to December 31, 2026. Four contracts have been executed to date from this RFP.
5. ~~Ongoing~~COMPLETE – SDCP released a 2023 Request for Proposals for Long-term California RPS-Eligible Renewable Energy in January 2023, for deliveries commencing prior to December 31, 2028. SDCP ~~has~~ executed one PPA from this RFP ~~and is in active negotiations with other developers~~.
6. COMPLETE - In May of 2023, SDCP issued a 2023 Request for Offers for Standalone Storage projects including long-term, new-build "long duration storage" capacity to be online by 2026/2028 to meet the relevant requirements within the CPUC's Mid-Term Reliability ("MTR") procurement order. SDCP has executed two ESSAs from this RFO solicitation.
7. Ongoing – SDCP issued a 2021 Request for Information for Local Renewable

Energy and Energy Storage. The RFI was updated in October 2023 to extend the eligibility of commercial operation dates through 2027. The Local RFI is a rolling RFI accepting applications for review year-round. Being an ongoing solicitation, and receiving interest from numerous developers, SDCP is actively evaluating and negotiating these projects. SDCP has so far executed contracts with nine local battery storage facilities~~through this solicitation.~~

8. Ongoing - SDCP has administered short-term RPS solicitations to fill known open positions related to RPS products. Contracts have been executed with short-listed ~~suppliers~~suppliers, and expected deliveries are now reflected in Appendix C of this Plan. SDCP will continue to administer solicitations for such products, as necessary, and will update future planning documents to the extent such solicitations result in additional procurement;
9. ~~Ongoing~~COMPLETE - In August 2023, SDCP issued a 2023 Request for Offers for DAC-GT & CSGT projects. SDCP executed one PPA from this RFO.
10. ~~Ongoing~~COMPLETE – In October 2023 SDCP released an RFO for distributed renewable energy resources (“DERs”) which focuses on a broad range of distribution-level renewable projects within San Diego County.
11. COMPLETE – In August 2024, SDCP issued a 2024 Request for Proposals for Cluster 15 Interconnection Process Enhancements Commercial Interest Allocation (“Cluster 15 IPE RFP”). SDCP executed five exclusivity agreements for renewable and storage projects participating in CAISO’s Cluster 15 process to award commercial interest points. SDCP will engage in negotiations for these projects should they progress with interconnection and be awarded deliverability.

~~—Planned—SDCP expects to administer a CAISO TPE solicitation in 2024 and additional RPS, Clean Firm, and SAS RFOs in 2024 and 2025.~~

12. ~~Ongoing~~ ONGOING – 2024 Long-Term RPS. SDCP has shortlisted projects and is actively engaged in negotiations.

~~11.~~13. COMPLETE – 2025 Clean Firm. No offers were received for any clean firm resources.

SDCP is also aware that renewable energy procurement activities must be timely completed to ensure the achievement of noted renewable energy targets, so it intends to continue such activities. These procurement efforts will be focused on securing necessary short-term and long-term renewable energy supply, the latter of which will be intended to facilitate compliance with California's 65 percent long-term contracting requirement, which became effective in 2021. SDCP acknowledges that certain long-term renewable contracting opportunities may require substantial lead time, particularly opportunities related to new-build renewable generating facilities. SDCP is aware that there may be lingering impacts of the pandemic on new-build renewable generating projects which may be heavily reliant on international supply chains to ensure timely completion. Additionally, transmission and interconnection upgrade delays across the state have impacted project timelines. There are challenges in determining the extent to which such effects will be experienced by SDCP and other buyers, but SDCP hopes to learn more by monitoring development progress of new renewable generating facilities that have been recently placed under contract. With time, SDCP remains optimistic that it will be able to facilitate a meaningful level of new renewable infrastructure buildout through its ongoing renewable energy contracting efforts and expects to confirm such expectations as it moves forward.

During administration of its ongoing renewable energy solicitation activities, SDCP will continue to gauge markets dynamics via responses from and discussion with prospective suppliers. SDCP's long-term bundled transactions with renewable developers and IOUs are necessary steps to secure such supply commitments as part of its resource planning and RPS compliance activities. SDCP is aware of potential repercussions associated with RPS compliance shortfalls and, with such concerns in mind, is committed to pursuing RPS contracting opportunities that will satisfy pertinent mandates, plus sufficient planning reserves.

As part of its ongoing planning process, SDCP is also considering the manner in which renewable energy compliance risks will be assessed and mitigated. One key element of this process included the adoption of a formal Energy Risk Management Policy ("ERM Policy")⁴, which occurred at the regularly scheduled meeting of SDCP's governing board on June 25, 2020. The ERM Policy addresses various types of risk and establishes related oversight in managing SDCP's various portfolio positions, control procedures, and delegations of authority related to the procurement of energy and capacity products. SDCP's ERM Policy also necessitates formation of a Risk Oversight Committee ("ROC"), which meets on a regular basis to monitor SDCP's procurement efforts, open positions, counterparty credit exposure and other concerns. Staff provides SDCP's ROC with various deal tracking and position reports to keep program management apprised of ongoing progress in meeting statewide compliance mandates and SDCP's internally adopted renewable planning targets, which exceed statewide mandates. The ROC also receives updates regarding the development progress of new-build renewable generating facilities that are expected to contribute to SDCP's RPS compliance mandates. In addition to the noted ERM Policy and ROC, SDCP's Chief Commercial Officer oversees the

⁴ See [San Diego Community Power Energy Risk Management Policy](#), June 25, 2020.

day-to-day management of resource planning, power supply acquisition, and related compliance activities and ensures ongoing coordination with SDCP's suppliers.

In order to ensure RPS compliance, especially during early stages of CCA formation, SDCP considers it crucial to ~~identity~~identify and select highly experienced and financially viable sellers during the administration of renewable energy solicitation processes. This understanding is supported by conversations with leadership of longer-standing California CCAs, which emphasized the importance of such an approach during renewable energy procurement efforts; such CCAs noted that the timing of early-stage RPS planning and procurement efforts (and the proximity of such efforts relative to imposition of the 65 percent~~9%~~ long-term contracting mandate) necessitated considerable reliance on: 1) existing renewable generating facilities; and/or 2) highly experienced project developers with strong track records of timely project completion. At this time, SDCP's contracting efforts have reduced, if not eliminated, any compliance shortfall risk. The remaining RPS-related risk to SDCP is only related to additional voluntary RPS procurement targets. SDCP remains confident that current renewable energy open positions, ~~again~~ only those related to the voluntary procurement targets, will be significantly reduced in the near future. Given SDCP's gross RPS procurement needs and existing procurement efforts, a quantitative risk assessment was recently completed by SDCP. The results of such assessment are presented below, including a description of the methodology used to complete it. As SDCP continues to update its risk assessment based on future contracting efforts and its impressions of various sources of RPS delivery risk, it will elaborate on its findings in future RPS Procurement Plans.

SDCP will carefully monitor the performance of selected renewable energy suppliers relative to projected RPS requirements and will augment procurement efforts in the event that

actual renewable deliveries fall below projections. Based on SDCP's minimum 50 percent renewable procurement target, the organization could suffer significant delivery shortfalls while still satisfying statewide compliance mandates.

III. Compliance with Recent Legislation and Impact of Regulatory Changes

This RPS Procurement Plan addresses the requirements of all relevant legislation and the Commission's regulatory framework. This Section describes the relevant statutory and regulatory requirements and how this RPS Procurement Plan demonstrates that SDCP will meet such requirements.

Senate Bill ("SB") 350 (stats. 2015) was signed by the Governor on October 7, 2015. SB 350 set a new RPS procurement target of 50 percent by December 31, 2030. On December 20, 2016, the Commission issued D.16-12-040, which partially implemented the increased targets of SB 350 by establishing new compliance periods and procurement quantity requirements. On July 5, 2017, the Commission issued D.17-06-026, which implemented some of the key remaining elements of SB 350, including adopting new minimum procurement requirements for long-term contracts and owned resources, as well as revising the excess procurement rules.

SB 100 was signed by the Governor on September 10, 2018, and became effective on January 1, 2019. SB 100 increased the RPS procurement requirements to 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. On June 6, 2018, the Commission issued D.18-05-026, which implemented changes made by SB 350 to the RPS waiver process and reaffirmed the existing RPS penalty scheme. In July of 2018, the Commission instituted Rulemaking 18-07-003 to continue the implementation of the RPS program. On June 28, 2019, the Commission issued D.19-06-023, which continues to use a straight-line method to calculate compliance period procurement quantity requirements.

The current RPS procurement targets are incorporated into SDCP's Renewable Net Short

Calculation Table as described in Section VIII below, and attached as Appendix C. SDCP's planned procurement, as reflected in SDCP's Renewable Net Short Calculation Table and described in Sections IV and V, is expected to exceed pertinent RPS procurement mandates, including a minimum margin of over-procurement based on SDCP's risk assessment, as further described in Sections VII and IX. SDCP also expects to meet California's SB 350 long-term procurement requirement, as described in Sections V and VII.

SB 901, signed by Governor Brown on September 21, 2018, added Public Utilities Code section 8388, which requires any IOU, publicly owned electric utility, or CCA with a biomass contract meeting certain requirements to seek to amend the contract to extend the expiration date to be five years later than the expiration date that was operative as of 2018. SDCP does not have a contract with a biomass facility that is covered by Public Utilities Code section 8388.

SB 255 (stats. 2020, ch. 407) amended Public Utilities Code § 366.2 to require certain CCAs to annually submit to the Commission the following: (i) a plan for "increasing procurement from small, local, and diverse business enterprises in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects," and (ii) a report regarding the CCA's "procurement from women, minority, disabled veteran, and LGBT business enterprises in all categories, including, but not limited to, renewable energy, energy storage system, and smart grid projects." SDCP's compliance with SB 255 is described in Section X.B below.

Assembly Bill ("AB") 843, signed by the Governor on September 23, 2021, authorizes CCAs to participate in the Bioenergy Market Adjusting Tariff ("BioMAT") program if capacity is available under the program cap. SDCP does not have any immediate plans to participate in

the BioMAT ~~program, but~~ [program but](#) may reevaluate this decision as part of its future planning for additional renewable procurement, which may also focus on ~~locally-situated~~ [locally-situated](#) biomass or biofuel resources outside of the BioMAT program.

SB 1020, referred to as “Clean Energy, Jobs, and Affordability Action of 2022,” sets a statewide goal of one hundred percent zero-carbon electricity by 2045. SB 1020 also directed every state agency to ensure that zero carbon resources and eligible renewable energy resources supply one hundred percent of the electricity procured on its behalf by 2035. These state agencies are specifically directed to meet this 2035 target through any or all of the following options: (i) installing behind the meter resources, (ii) procuring zero-carbon or eligible renewable energy resources through the POU, IOU, CCA, or ESP that is providing retail service to that state agency, or (iii) participating in a qualifying voluntary shared renewable or green pricing program. SDCP is in the early stages of identifying and coordinating with any state agency customers regarding their planned compliance with SB 1020. SDCP [does not see any impacts on RPS procurement planning due to SB 1020 as SDCP’s internal targets are to serve 100% renewable \(and thus carbon free\) energy by 2035](#) ~~will provide a more detailed update on the impacts of SB 1020 to its RPS procurement planning efforts in a subsequent RPS Procurement Plan.~~

SDCP is closely tracking federal legislation relating to clean energy tax credits. Congress is expected to send the President budget reconciliation legislation that would extend the 2017 Tax Cuts and Jobs Act. Congress will need to make corresponding budget cuts to pay for the Tax Act extension. One means of creating savings is to reduce or eliminate federal energy tax credits that support the transition to clean energy. Current law, as enacted by the Inflation Reduction Act of 2022, provides a 30% tax credit for utility scale clean energy projects. Both the House of

Representatives and Congress have proposed budget reconciliation plans.

House of Representatives H.R.1, referred to as the “One Big Beautiful Bill Act,” is the budget reconciliation legislation approved by the House on May 22, 2025. H.R.1 will potentially affect the following energy tax credit issues:

- Eliminate the New Clean Vehicle Tax Credit, the 30% residential and storage credit (“RCEC”) and the home energy efficiency and electrification upgrade (“HEEIC”) tax credit;
- Phase out the Investment Tax Credit (“ITC”) and the Production Tax Credit (“PTC”) for all utility-scale technologies by the end of 2028. Projects would have to either start construction within 60 days of the bill’s enactment or be placed into service by December 31, 2028, to qualify; and
- Impose restrictive foreign entities of concern (“FEOC”) conditions on projects seeking ITC and PTC benefits in such a manner that energy facilities could not receive any material assistance from foreign controlled or influenced entities, including the component parts of facilities. This largely means that any energy project with any parts from China, or a company with ties to China, would not be eligible. This would go into effect on December 31, 2025.

The Senate Finance Committee released their approach to budget reconciliation on June 16, 2025, which will likely have the following effects on energy tax credits:

- Eliminate the New Clean Vehicle, RCEC and the HEEIC tax credits;
- Phase out the ITC and PTC differently depending on technology:
 - For wind and solar: limit the credits to 60% of their value for facilities that begin construction in 2026 and 20% of the credit value for facilities that

begin construction in 2027. There would be no credit in years thereafter;

- For other clean energy technologies: 100% through 2033, then 75% in 2034, 50% in 2035, and 0% starting in 2036; and
- Impose complex FEOC restrictions to all clean energy technologies.

The final outcome of the proposed modifications to the clean energy tax credits is still unclear, as there are several steps left in the Congressional process. Approximately two-thirds of SDCP's forecasted renewable energy volume under development in our contracted portfolio is from either projects under construction or those having met the construction start safe harbor provisions (i.e. meeting a 5% threshold of capital investment delivered or stored). Those projects are not anticipated to be affected by modifications to the rules on tax credit eligibility, whether under H.R. 1 or the bill proposed by the Senate Finance Committee.

With respect to SDCP's contracted energy storage projects, the Senate's version of the bill appears to explicitly allow energy storage assets to capture the full ITC with the initial reduction not occurring until 2034, and be safe harbored from the FEOC restrictions if the project had a contract before June 16 of 2025. However, the Senate's FEOC restrictions would likely have a material impact on the eligibility of the ITC for those projects not having a contract at this time. SDCP is investigating to what extent the FEOC composition ratio thresholds (e.g. 50% in 2026) under the Senate's version can be met with currently anticipated supply chains for battery energy storage and other technologies. Regardless of technology, it is too soon to draw conclusions on the likely impacts to project costs and viability under any new tax credit.

On January 20, 2025, President Trump released the Unleashing American Energy Executive Order ("EO") revoking the previous EO #14008, which allowed the Bureau of Land Management ("BLM") to prioritize permitting of renewable energy on federal lands.

Concurrently, the Department of Interior, which oversees BLM, issued a 60-day pause authorizing any renewable energy projects. SDCP has learned that the permitting pause – for solar at least – is no longer in effect and projects are still being approved. However, BLM may not be approving the projects at an expeditious rate given the Administration’s priority permitting focus on traditional energy projects. As a potential positive sign, the BLM recently announced approval of a solar project in Arizona.

SDCP has a PPA for a large solar ~~photovoltaic~~^{PV} and battery project, Purple Sage, which is largely sited on BLM land. In May, SDCP’s Board of Directors approved an amendment to this PPA that extends the guaranteed commercial operation date by a year into 2028. SDCP will continue to monitor progress made on project permitting and development as it relates to Purple Sage and potential future projects on federal lands.

IV. Assessment of RPS Portfolio Supplies and Demand

— IV.A. Portfolio Supply and Demand

(i) Assessment of Portfolio Supply and Demand through 2035

As previously noted, SDCP successfully initiated customer service in March 2021. As of end-of-year ~~2023~~²⁰²⁴ SDCP is serving over ~~930,000~~^{950,000} accounts, which are expected to consume over ~~8,000~~^{87,0300} GWh per year. SDCP has now executed ~~thirteen~~^{fourteen} long-term PCC1 supply contracts that will result in the delivery of approximately 3,043 GWh per year following the successful commercial operation of the renewable generating projects. Further, SDCP’s election of long-term PCC1 and PCC0 supply contracts via VAMO allocations will result in the delivery of over 2,~~8600~~^{8,600} GWh per year. Of the new-build projects not yet online, seven projects will utilize photovoltaic solar generating technology combined with battery storage to allow for re-shaping of project energy ~~deliveries~~^{deliveries}, and one will utilize wind technology.

Additional contracting efforts remain in process with additional solicitations scheduled in the future. Following the completion of negotiation activities associated with any long-term renewable supply agreement, the final contract(s) will be brought before SDCP's governing board for approval and, if approved, will be executed thereafter. Short-term renewable supply agreements may be executed by SDCP's Chief Executive Officer pursuant to delegated contracting authorities – the limitations associated with such contracting authorities are reflected in SDCP's Energy Risk Management Policy.

The ongoing examination of customer electricity usage and other market developments should help reduce costs and assist in meeting planned procurement for the period reflected in this RPS Procurement Plan. SDCP notes that understanding customer electricity usage may be more challenging than usual during ~~phased-in operations (when CCA participation rates can exhibit a certain level of volatility) and expansion activities. These challenges could be exacerbated by~~ the implementation of fiscal policy changes intended to curb inflation (via phased interest rate increases) that may impose recessionary pressures on the economy. If recessionary markers start to surface, including reduced spending, business closures, constrained access to credit, etc., SDCP will attempt to evaluate the extent to which future customer energy usage may be affected. Regarding demand side impacts, these are often more challenging to isolate, as normal variations in usage caused by weather may obscure otherwise atypical variations in consumption. For renewable energy planning purposes, SDCP's primary retail sales forecast adjustments have been related to expected customer enrollments enrollments, without noteworthy adjustments related to these circumstances. To the extent that retail sales fall below SDCP's expectations, it is likely that renewable energy content will be higher than necessary to promote achievement of programmatic goals. In such cases, SDCP expects that it could: 1) sell excess

renewable energy supply to interested buyers, thereby rebalancing its portfolio to align with desired renewable energy targets; 2) retain excess renewable energy supply, providing customers with higher-than-promised renewable energy supply; or 3) explore other options that may be available under California's RPS program to utilize excess volumes in another calendar year or compliance period. Such decisions will be made following consultation with SDCP's governing board, staff, and technical advisors.

SDCP is also attempting to gain an improved understanding of the prospective impacts to its customer base associated with the potential reopening of California's direct access market due to SB 237 (2018) and D.19-05-043. In D.21-06-033, the Commission recommended against expanding direct access at this point, however, SDCP recognizes that this may change in the future. As such, SDCP will monitor the proceeding to determine potential impacts to its planning process. To the extent that SDCP load migrates to direct access providers, its retail sales would likely fall – in theory, such a change would increase SDCP's proportionate renewable energy content unless surplus supply was sold to other market participants; this would be similar to the impacts experienced by California's IOUs, which have resulted from ongoing CCA implementations and expansions – following these activities, the proportionate RPS content of each IOU has increased, as evidenced in the annual Power Source Disclosure Report of each IOU (for reference, this has occurred in spite of IOU-administered solicitations intended to sell off surplus RPS supply, which suggests that other retail sellers, particularly CCAs, have already made meaningful progress in meeting applicable RPS mandates in the near-term planning horizon). To the extent that any direct access-related adjustments are incorporated in SDCP's RPS planning processes, it will reflect them in a subsequent RPS Procurement Plan. Through the ongoing evaluation of customer demand and other market

developments, SDCP hopes to promote reduced overall costs while meeting planned procurement objectives for the period addressed in this RPS Procurement Plan.

(ii) Assessment of Need for RPS Resources with Specific Deliverability Characteristics

~~At this time, SDCP has no explicit preference for specific renewable generating technologies and will consider all responses to its solicitations with the goal~~ SDCP has a goal of assembling a diversified renewable energy supply portfolio that will deliver energy in a profile that is generally consistent with SDCP's anticipated load shape – SDCP's growing portfolio of renewable supply commitments will be increasingly considerate of load/resource balances and will attempt to promote such balance to the greatest practical extent. SDCP utilizes a portfolio risk management approach as part of its power purchasing program, seeking low-cost supply (based on then-current market conditions) as well as diversity among technologies, production profiles, project sizes and locations, counterparties, lengths of contract, and timing of market purchases. Currently, SDCP is focused on adding resources such as geothermal and wind to its portfolio to complement its expansive solar photovoltaic and 4-hour battery portfolio. Such resources will add overnight deliveries to help balance SDCP's delivery profile. ~~Those portfolio benefits need to be weighed against cost that could impact affordability.~~

In carrying out its planning functions, SDCP will also consider the deliverability characteristics of its future generating resources placed under contract (such as the resource's dispatchability, available capacity, and typical production patterns) and will review the respective risks associated with short- and long-term purchases as part of its forecasting and procurement processes. The lack of deliverability, especially in its local region, provides risks and challenges that need to be considered in effective procurement and portfolio planning.

Current backlogs place risk on project viability as even projects with deliverability status can have their net qualifying capacity cut for up to 10 years by CAISO, placing risk on revenues ~~from~~ to the project or putting that risk on LSEs such as SDCP.

To date, in pursuit of a balanced portfolio that ensures reliable renewable energy supply, SDCP has contracted with seven solar resources which are hybridized or co-located with battery storage, two wind generating facilities which have generation profiles that are complementary to the solar and in-state wind generation shapes, and is actively negotiating with or soliciting offers for additional ~~hybrid~~ renewable resources paired with storage, stand-alone storage facilities, and “clean firm” renewable resources. Going forward, SDCP will continue to balance these competing portfolio management interests to support reasonably close alignment between supply and demand (reducing the need for pronounced resource ramping on the system), cost-effective procurement and overall grid reliability.

Please See IV.B(i) for more detailed analysis.

(iii) Experience Managing Exposure to Negative Market Prices

Please see section IV.B.2-(c).

(iv) Assessment of how the Renewable Net Short Quantitative Analysis Supports the Assessment of Portfolio Supply and Demand

Due to SDCP’s successful procurement efforts to date, it is now accruing renewable energy quantities in excess of applicable statewide mandates. SDCP will effectively ensure its compliance with applicable RPS mandates by procuring in consideration of internal renewable energy goals that meaningfully exceed state-adopted requirements. SDCP currently provides a minimum 50% renewable energy content target to most customers as part of its default retail service offering, PowerOn. SDCP’s governing board may periodically consider increases to

such renewable energy content for purposes of ensuring that SDCP differentiates its supply portfolio from applicable state-mandated renewable content. The extent to which SDCP will exceed statewide RPS mandates ~~will be dependent~~ will depend upon a variety of factors, including RPS product availability, product cost and budgetary impacts and timely product deliveries from generating facilities under contract with SDCP. As SDCP's governing board considers and adopts changes to its internal renewable energy procurement targets, the organization will accordingly update future RPS planning documents to reflect such changes. In Summary, the Renewable Net Short Analysis in Section VIII supports SDCP assessment that it will have enough supply through all compliance periods to meet the state minimum RPS requirements.

(v) How Procurement, Allocations, or Sales Planned for the Period Covered by the 2025 RPS Plan is Consistent with the Evaluation of Supply and Demand

~~Over time~~For the period covered by this 2025 RPS Plan, SDCP expects to continue meeting pertinent RPS compliance obligations by entering into a variety of renewable energy supply agreements of varying term lengths and structures. The exact portfolio characteristics selected may vary depending on direction received from SDCP's governing board, renewable resource availability, procurement costs, legislative and policy changes, technological improvements, principles of resource diversity, preferences of the Member Agencies, and other developments. To manage this future uncertainty, SDCP will regularly evaluate anticipated supply requirements in consideration of expected customer electricity usage and anticipated renewable energy deliveries; such information is expected to influence future procurement efforts, which will attempt to balance customer usage with requisite resource commitments. SDCP is also aware of the need to promote the use of a diverse renewable resource portfolio, avoiding overcommitting to certain generating technologies, suppliers, geographic regions, etc.

For now, the organization must remain open minded and considerate of all possible supply options. SDCP must also proceed with its RPS planning and procurement activities under a “compliance first” mindset with the primary goal of securing necessary RPS supply from available generating sources – because financial penalties related to compliance shortfalls under the RPS program are not waived or reduced in consideration of portfolio characteristics (such as technology and/or geographic diversity).⁵ It is advisable for new retail sellers, including SDCP, to primarily focus on securing requisite volumes, even if the majority of such volumes happen to be associated with a specific technology type or geographic region. This noted, SDCP will continue to make reasonable efforts to promote resource diversity during its renewable energy planning and procurement processes, and if such processes do not result in the desired level of resource diversity, SDCP will craft future solicitations to promote renewable energy portfolio diversity. For now, SDCP has successfully secured renewable energy deliveries that utilize wind, solar, and “solar plus battery storage,” the last of which will allow SDCP to reshape typical solar production to better align with customer energy use and market price signals.

IV.A.1. Long-Term Procurement

(i) Assessment of How Current and Planned Procurement Meets 65 Percent Long-Term Contracting Procurement Requirement Through 2035.

Pursuant to Public Utilities Code section 399.13(b), from 2021 onwards, 65 percent of mandated renewable energy purchases must be sourced from contracts of 10 years or more.⁵

⁵ Cal. Pub. Util. Code § 399.13(b)(1) (“A retail seller may enter into a combination of long- and short-term contracts for electricity and associated renewable energy credits. Beginning January 1, 2021, at least 65 percent of the procurement a retail seller counts toward the renewables portfolio standard requirement of each compliance period shall be from its contracts of 10 years or more in duration or in its ownership or ownership agreements for eligible renewable energy resources.”).

Currently, SDCP has covered at least 65 percent of the mandated renewable energy purchases through long-term contracts over 10 years. Beyond 2030, this percent approaches 100 percent.

(ii) Quantitative Assessment of Long Term RPS Position

This anticipated trajectory, which includes certain of SDCP's long-term VAMO allocation elections, is reflected in the following table.

	<u>CP4</u>	<u>CP5</u>	<u>CP6</u>
	<u>2021-2024</u>	<u>2025-2027</u>	<u>2028-2030</u>
<u>SDCP Retail Sale - MWh</u>	<u>22,772,971</u>		<u>24,307,970</u>
<u>State Mandated RPS Target - % of Retail Sales</u>	39.90 <u>41.0%</u>		<u>57.33%</u>
<u>SDCP State Mandated RPS Target- MWh</u>	9,343,696 <u>9,338,984</u>		<u>13,938,711</u> 723
<u>State Mandated 65% Long-Term Contracting Target - MWh</u>	6,073,402 <u>6,070,340</u>		<u>9,060,170</u> 62
<u>SDCP Long-term Procurement Achieved – MWh</u>	<u>8,129,829</u>		<u>21,638,822</u>
<u>SDCP Long-term Procurement Achieved - %</u>	<u>134%</u>		<u>239%</u>

As reflected in the previous table, SDCP ~~expects to meaningfully exceed~~exceeded applicable long-term RPS procurement mandates in Compliance Period 4. More specifically, for Compliance Period 4, SDCP ~~expects to procure~~procure in excess of ~~140~~134% of its required long-term RPS mandate (which means that SDCP ~~expects to procure~~procure ~~91~~87% of total statutorily mandated RPS purchases from long-term contracts), based on ~~-expected-~~long-term RPS deliveries of over ~~8,5007,700~~8,100GWh, relative to a ~~-projected~~ long-term procurement obligation of about ~~6,100~~6,000 GWh. Similarly, in Compliance Period 5, which includes calendar years 2025 through 2027, SDCP also expects to procure in excess of [REDACTED] of its

required long-term RPS mandate (which means that SDCP again expects to procure greater than [REDACTED] of total statutorily mandated RPS purchases from long-term contracts), based on expected long-term RPS deliveries of over [REDACTED], relative to a projected long-term procurement obligation of approximately [REDACTED]. In Compliance Period 6, which includes calendar years 2028 through 2030, SDCP expects to procure about 175239% of its required long-term RPS mandate (which means that SDCP again expects to procure approximately 114155% of total statutorily mandated RPS purchases from long-term contracts), based on expected long-term RPS deliveries of approximately 16,600-21,600 GWh, relative to a projected long-term procurement obligation of approximately 9,400-9,000 GWh.

These projections are based on estimated annual deliveries to be received under SDCP's long-term VAMO supply agreement with SDG&E, which was executed on December 20, 2021. While SDCP previously advised the Commission of its intent to accept certain long-term RPS volumes under VAMO, this agreement has now been finalized.—SDCP has also accepted long-term MO award volumes that will contribute to these compliance periods, as well contracting for as-new build renewable development projects. The previous procurement delivery estimates have accounted for the net-contribution impact of SDCP's VAMO supply-to-overall-renewable-energy-purchases, and SDCP believes it would successfully achieve compliance with long-term RPS procurement mandates through 2030 under a variety of adverse scenarios in which sever delivery shortfalls could occur.

Even with long-term RPS deliveries expected to meaningfully exceed applicable mandates, SDCP expects to continue the selective pursuit of additional long-term RPS contracting opportunities via independently administered solicitations and bilateral contracting discussions. Future long-term RPS contracting efforts are likely to focus on diversifying SDCP's

RPS supply portfolio and may include additional hybrid generating configurations, baseload renewable generating technologies, and emerging renewable generating technologies that would be expected to promote budgetary certainty and grid reliability.

(iii) Summary of Current and Planned Long-Term RPS Procurement

SDCP has been conscientiously pursuing contracting opportunities to meet this requirement and has now entered into ~~thirteen~~ fourteen unique long-term PCC1 supply agreements (VAMO, two Market Offers, ten PPAs, one cluster of local distributed energy projects), which include:

1) a long-term (20-year) PCC1 supply agreement with Vikings Energy Farm, LLC, executed on May 3, 2021, which will cause the delivery of approximately 250,000 MWh per year of renewable energy produced by a new 136.8 megawatt photovoltaic solar array (plus battery storage) located in Imperial County that commenced commercial operation in August 2024;

2) a long-term (20-year) PCC1 supply agreement with JVR Energy Park, LLC, executed on June 4, 2021, which will cause the delivery of approximately 260,000 MWh per year of renewable energy produced by a new 90 megawatt photovoltaic solar array (plus battery storage) located in San Diego County that is expected to commence commercial operation in October 2026;

3) a long-term (15-year) PCC1 supply agreement with IP Oberon, LLC, executed on June 11, 2021, which will cause the delivery of approximately 225,000 MWh per year of renewable energy produced by a new 75 megawatt photovoltaic solar array located in Riverside County that commenced commercial operation in July 2023;

4) a long-term (10-year) PCC1 supply agreement with Duran Mesa LLC, executed January 27, 2022, which will cause the delivery of approximately 170,000 MWh per year of

renewable energy produced by 50 MW of new wind capacity located in Torrance County, New Mexico that achieved commercial operation (on November 30, 2021, as reflected in the California Energy Commission's associated certificate for this project) and began delivering power to SDCP on February 1, 2022;

5) a long-term (5-year) PCC1 supply agreement with Pacific Gas and Electric Company, executed on September 30, 2022, for an existing 29 megawatt biomass renewable generation facility located in Burney, CA that is online;

6) a long-term (20-year) PCC1 supply agreement with Orni 30 LLC, executed on June 29, 2023, for a new 42 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Imperial County that is expected to commence commercial operation in
~~October~~November~~October/November~~ 2025;

7) a long-term (20-year) PCC1 supply agreement with Yellow Pine Solar III, LLC, executed on July 3, 2023, for a new 35 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in June 2027;

8) a long-term (20-year) PCC1 supply agreement with Vidal Solar, LLC, executed on Jan 2, 2024, for a new 160 megawatt photovoltaic solar array (plus 160 MW battery storage) located in San Bernardino county that is expected to commence commercial operation in December 2026;

9) a long-term (15-year) PCC1 supply agreement with SunZia Wind PowerCo LLC, executed on November 7, 2023, for a new 150 megawatt wind generation facility located in New Mexico that is expected to commence commercial operation in March 2026;

10) a long-term (15-year) PCC1 supply agreement with Pelicans Jaw Solar, LLC,

executed on May 1, 2024, for a new 440 megawatt photovoltaic solar array (plus 238.5 MW battery storage) located in Kern county that is expected to commence commercial operation in September 2026;

11) a long-term (20-year) PCC1 supply agreement with Nobel Solar, LLC, executed on March 15, 2024, for a new 400 megawatt photovoltaic solar array (plus 400 MW battery storage) located in Clark county, Nevada that is expected to commence commercial operation in January 2029;

12) a long-term (20-year) PCC1 Market Offer award with PG&E (deliveries from 2023-2043); and

13) a long-term (17-year) PCC1 Market Offer award with SDG&E (deliveries from 2023-2040); and-

14) multiple long-term (20 year) contracts with a local developer on a group of distributed energy storage and solar battery storage projects in San Diego County, totaling 5.49 MW of solar (plus 20.57 MW storage capacity).

~~1) a long term (20 year) PCC1 supply agreement with Vikings Energy Farm, LLC, executed on May 3, 2021, which will cause the delivery of approximately 250,000 MWh per year of renewable energy produced by a new 136.8 megawatt photovoltaic solar array (plus battery storage) located in Imperial County that is expected to commence commercial operation in September 2024;~~

~~2) a long term (20 year) PCC1 supply agreement with JVR Energy Park, LLC, executed on June 4, 2021, which will cause the delivery of approximately 260,000 MWh per year of renewable energy produced by a new 90 megawatt photovoltaic solar array (plus battery storage) located in San Diego County that is expected to commence commercial operation in October~~

2026;

3) a long term (15 year) PCC1 supply agreement with IP Oberon, LLC, executed on June 11, 2021, which will cause the delivery of approximately 225,000 MWh per year of renewable energy produced by a new 75 megawatt photovoltaic solar array located in Riverside County that commenced commercial operation in June 2023;

4) a long term (12 year) PCC1 supply agreement with SDG&E, executed on December 20, 2021, which will cause the delivery of approximately 120,000 to 2,600,000 MWh per year of renewable energy produced by a portfolio of RPS eligible generating resources, as listed in the contract, beginning in 2022;

5) a long term (10 year) PCC1 supply agreement with Duran Mesa, LLC, executed on January 27, 2022, which will cause the delivery of approximately 170,000 MWh per year of renewable energy produced by a 50 MW share of a 105 MW wind project located in Torrance County, New Mexico that achieved commercial operation (on November 30, 2021, as reflected in the California Energy Commission's associated certificate for this project) and began delivering power to SDCP on February 1, 2022;

6) a long term (20 year) PCC1 supply agreement with Orni 30 LLC, executed on June 29, 2023, for a new 42 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Imperial County that is expected to commence commercial operation in April 2025;

7) a long term (20 year) PCC1 supply agreement with Yellow Pine Solar III, LLC, executed on July 3, 2023, for a new 35 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in October 2025;

8) a long term (20 year) PCC1 supply agreement with CDH Vidal LLC, executed

~~January 2, 2024, for a new 160-megawatt photovoltaic array (plus 160 MW battery storage) located in San Bernadino County that is expected to commence commercial operation in June 2026;~~

~~9) a long-term (20-year) PCC1 supply agreement with Noble Solar LLC, executed March 15, 2024, for a new 400-megawatt photovoltaic array (plus 400 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in June 2027;~~

~~10) a long-term (15-year) PCC1 supply agreement with Pelicans Jaw Solar LLC, executed May 1, 2024, for a new 440-megawatt photovoltaic array (plus 238.5 MW battery storage) located in Kern County that is expected to commence commercial operation in April 2027;~~

~~11) a long-term (15-year) PCC1 supply agreement with SunZia Wind PowerCo LLC, executed November 7, 2023, of a new 150-megawatt renewable wind energy generation, located in New Mexico;~~

~~12) Long-term (20-year) PCC1 Market Offer award from PG&E (approx. 2023-2043);~~
~~and~~

~~13) Long-term (17-year) PCC1 Market Offer award from SDG&E (approx. 2023-2040).~~

Note that of the aforementioned projects, Duran Mesa, ~~and~~ IP Operon, and Vikings have achieved commercial operation, and the noted agreements with SDG&E (VAMO and MO) and PG&E (MO) will be exclusively supplied from existing/operational projects, which serves to de-risk a significant portion of SDCP's upcoming long-term RPS deliveries. SDCP's expansion activities in 2022 and 2023 necessitated its acceptance of certain long-term allocations available under VAMO to ensure compliance with applicable long-term contracting requirements during CP4 and beyond. It is worth noting that SDCP intends to continue focusing the significant

majority of its PCC1 contracting efforts on contract durations of ten years or longer, which should contribute to the accrual of a planning reserve over time, alleviating concerns regarding long-term contract compliance.

(iv) Timeline Meeting 65 Percent Long Term Procurement Requirement.

SDCP has already executed enough contracts to meet the 65 percent long-term contracting requirement.

IV.B Portfolio Diversity and Reliability

(i) Description of How Portfolio Diversity is Considered.

Power purchased from power marketers, public agencies, generators, CCAs, or utilities will be a source of supply for SDCP's operation. Based on current contracting efforts, SDCP expects to obtain requisite electricity supply from several suppliers, including power marketers, project developers, and/or IOUs. Such suppliers will be responsible for delivering a portion of SDCP's intended resource mix, including SDCP's desired quantities of renewable and carbon-free energy, to provide a stable and cost-effective resource portfolio.⁶

In carrying out its planning functions, SDCP will also consider the deliverability characteristics of its future generating resources placed under contract (such as the resource's dispatchability, available capacity, and typical production patterns) and will review the respective risks associated with short- and long-term purchases as part of its forecasting and procurement processes. These efforts should lead to a more diverse resource mix, address grid integration issues, and provide value to the Member Agencies. The lack of deliverability,

⁶ See San Diego Community Power Community Choice Aggregation Implementation Plan and Statement of Intent, December 9, 2019, p.1 at 6.6, available at <http://sdcommunitypower.org/resources/key-documents/>.

especially in its local region, provides risks and challenges that need to be considered in effective procurement and portfolio planning. Current backlogs place risk on project viability as even projects with deliverability status can have their net qualifying capacity cut for up to 10 years by CAISO, placing risk on revenues from the project or putting that risk on LSEs such as SDCP.

SDCP ~~intends to utilize~~ utilizes a portfolio risk management approach as part of its power purchasing program, seeking low-cost supply (based on then-current market conditions) as well as diversity among technologies, production profiles, project sizes and locations, counterparties, lengths of contract, and timing of market purchases. ~~For its recently executed long-term renewable supply agreements with new generating resources,~~ SDCP currently utilizes portfolio management tools, including a platform with cQuant Advanced Analytics which, among other analyses, calculates volume at risk due to resource intermittency, curtailment and outages. For projects not yet operational, SDCP conducts regular project-specific scenario analysis to account a range of potential risks to project delays. ~~has reflected a risk adjustment (failure/under delivery rate) of 5 percent in year one and 3 percent in each year thereafter. The larger year one adjustment is intended to account for potential late deliveries (resulting from delayed commercial operation), while the smaller ongoing risk adjustments are intended to account for resource intermittency and the potential for lower than anticipated energy production. These assumptions were informed by discussions with other CCA organizations.~~

SDCP will procure renewable and other requisite energy products, as necessary, to ensure that the future energy needs of its customers are met in a reliable and cost-effective manner, consistent with applicable compliance mandates. SDCP, through its CCA Implementation Plan and subsequent planning discussions, has established initial procurement targets for requisite renewable energy supply, including subcategories for various renewable

energy products, and has also established targets for related planning reserves as described elsewhere in this document. To the extent that SDCP's energy needs are not fulfilled through the use of renewable generating resources, it should be assumed that such supply will be sourced from carbon-free and/or conventional energy resources, such as hydroelectric or natural gas generating technologies, as well as system power purchases.

A key component of SDCP's planning process relates to the analysis and consideration of expected load obligations with the objective of closely balancing supply and demand, rate stability, and overall budgetary impacts. This process primarily focuses on the compilation and analysis of historical customer data, as provided by SDG&E, identification of any ineligible or excluded accounts (that will not be enrolled in CCA service), and related refinements to SDCP's retail sales forecasts. Similar to most CCAs, SDCP expects that such historical data will not be a perfect predictor of future customer energy requirements, so it intends to actively monitor actual customer usage over time, refining such forecasts as well as its ability to minimize variances between procured energy quantities and actual usage. SDCP also plans to maintain portfolio coverage targets of up to 100 percent (of expected customer energy requirements) in the near-term (0 to 2 years) but will leave larger open positions in the mid- to long-term, consistent with generally accepted industry practices.

~~At this time, SDCP has no explicit preference for specific renewable generating technologies and will consider all responses to its solicitations with the goal of assembling a diversified renewable energy supply portfolio that~~ As mentioned, SDCP is focused on adding resources such as geothermal and wind to its portfolio to complement its expansive solar photovoltaic and 4-hour battery portfolio. Such resources will add overnight deliveries to help balance SDCP's delivery ~~profile will deliver energy in a profile that is generally to~~ profile to be

consistent with SDCP's anticipated load shape. —SDCP's growing portfolio of renewable supply commitments will be increasingly considerate of load/resource balances and will attempt to promote such balance to the greatest practical extent. SDCP is also aware that use of intermittent renewable generating technologies has the potential to create occasional misalignments between customer energy consumption and related power production as well as the general quantity of renewable energy received from such projects. SDCP expects that its voluntary commitment to a minimum 50 percent renewable supply portfolio will protect against this uncertainty. In addition, and for purposes of promoting better alignment of customer energy usage and expected energy deliveries, SDCP has invested heavily in both ~~is considering both~~ stand-alone storage and hybrid or co-located storage and renewable energy projects with over 1.5 GW of battery energy storage to be developed in the next four years ~~via its ongoing Local RFI, targeted storage RFPs, and its continuing all source RPS RFPs.~~

To more closely align SDCP's resource portfolio with the evolving energy requirements of its member communities, SDCP anticipates that a diverse set of renewable resources will be necessary, including the strategic inclusion of generating resources, energy storage resources, and complementary infrastructure that may allow SDCP to dispatch/shape such supply in consideration of evolving customer energy needs and usage patterns.

(ii) Description of How Planned RPS Portfolio Diversity will Contribute to System Reliability.

With respect to system reliability, SDCP is aware of the need to pursue a portfolio of renewable resources with diverse and complementary delivery profiles as well as complimentary infrastructure (namely, energy storage infrastructure) that will support the reshaping of renewable energy deliveries to better align with load. SDCP considers its overall

portfolio and system requirements, including expected load curves and duration, in its procurement efforts. For example, renewable energy procurement efforts that may initially focus on relatively low-cost solar resources will often necessitate subsequent investments in co-located energy storage infrastructure or higher-cost baseload renewable generating technologies, such as those using geothermal, biomass and landfill gas fuel sources. These baseload renewable technologies are often priced at three-to-four times the level of in-state photovoltaic solar generation but generally provide increased capacity value (due to the more predictable, baseload generating profiles of such resources) and related reliability enhancements.

To date, in pursuit of a balanced portfolio that ensures reliable renewable energy supply, SDCP has contracted with seven solar resources which are hybridized or co-located with battery storage, two wind generating facilities which have generation profiles that are complementary to the solar and in-state wind generation shapes, and is actively negotiating with or soliciting offers for additional local hybrid renewable resources, stand-alone storage facilities, and “clean firm” renewable resources. Going forward, SDCP will continue to balance these competing portfolio management interests to support reasonably close alignment between supply and demand (reducing the need for pronounced resource ramping on the system), cost-effective procurement and overall grid reliability. SDCP ~~is aware that low-cost, long-term solutions are challenging to identify at this time, but it will~~ remains committed to pursuing a conscientious planning process that balances grid reliability, compliance demonstration and customer cost impacts. SDCP is willing to engage in discussions with SDG&E and the California Independent System Operator regarding reliability and other system impacts related to its portfolio. SDCP is further willing to consider the feedback provided by the organizations in its

planning and procurement processes going forward, so long as such suggestions generally conform with organizational objectives and Board-adopted policies.

SDCP's procurement efforts have mitigated any negative system impacts through its Risk Oversight Committee ("ROC"), which meets on a regular basis to discuss any potential risks to the portfolio. Staff updates the ROC with any issues they have identified, ensuring that the different teams within SDCP are aligned on the procurement plan to prioritize system needs and customer satisfaction. SDCP vets each contract to ensure that any foreseeable risks are considered before contract execution~~execution, and execution~~ and also maintains excellent working relationships with developers to ensure that any unforeseen changes are resolved in good faith to ensure the viability of projects to the extent possible.

SDCP's portfolio addresses the issues of renewable integration and the underutilization of existing RPS-eligible generation by ~~by...~~ continuing to subscribe to battery storage projects, allowing renewable resources, that would otherwise be curtailed, to contribute to renewable grid supply. This storage strategy is intended to help meet peak demand in a dispatch-like manner without the reliance on dispatchable fossil-fuel resources. SDCP's encouragement of demand response assets are~~isare~~ also intended to further support the grid in potentially strained conditions, additionally optimizing the transition from solar saturated mid-days into peak hours. ~~conditions. by...~~

~~In consideration of SDCP's diverse contractual commitments for requisite renewable energy supply and ongoing focus on the identification of RPS-eligible and complementary technologies that will mitigate reliability impacts associated with increased use of intermittent generating resources throughout the state, overall risks to system reliability associated with SDCP's RPS Procurement Plan were determined~~

~~to be low.~~

(iii) Description of How Portfolio Diversity will Maximize Ratepayer Value While Minimizing Costs and Risks.

SDCP's portfolio development was designed to minimize project development risk and technology risk to maximize ratepayer value. Given the relatively new nature of the SDCP's portfolio, this strategy was key in risk modeling and project selection. The planned diversity includes, but is not limited to, (1) choosing different times to contract with projects to ensure short-term price impacts do not impact the whole portfolio, (2) contract with projects with varying development timelines to help mitigate development risk, (3) ensuring a robust energy storage portfolio to shift renewable generation and maximize project revenues, (4) contract with projects with geographic diversity to limit localized impacts from weather and congestion, and (5) choose varying contracting structures (e.g. bundled, Index, top bottom swap) to hedge pricing risk. The combination of the above is intended to allow diversity to reduce risk and cost leading to maximization of the ratepayer value.

(iv) Description of How Energy Storage and Emerging Technologies are Addressed in Reliability and Diversity Planning.

~~Energy storage use~~SDCP is actively contracting with energy storage resources. To date, SDCP has contracted for over 1,238 MW of 4-hour storage capacity and 260 MW of 8-hour storage capacity. These projects will add significant reliability to the CAISO grid while also helping to shift the abundance of solar photovoltaic generation during the middle of the day to key peak hours. SDCP's current energy storage portfolio is heavily reliant on 4-hour technologies, and it is actively looking to diversify its portfolio with both longer duration technologies and different battery composition types.

While SDCP is not opposed to considering emerging renewable generating technologies, SDCP has yet to receive credible and cost-competitive proposals from emerging renewable generating technologies, but. If such proposals arrive in the future, they will be closely considered alongside other viable options. SDCP's renewable supply commitments must result in reliable, cost-effective supply to promote compliance with applicable RPS mandates without bearing the risks typically associated with newer technologies. Until compelling proposals for emerging renewable generating technologies are received, SDCP will likely exhibit preferences for proven generating technologies and supply structures that will minimize delivery risk during early-stage operation while allowing for re-shaping of certain renewable generating profiles to better align supply with demand. If, however, a compelling offer is presented for a cost-effective emerging technology, SDCP will evaluate such proposal on its merits relative to other available offers.

IV.B.1 Forecasting for Increased Transportation Electrification

SDCP forecasts its future load growth by applying a fixed annual increase of approximately 1.7% in retail sales as compared to the prior year. This forecast value was derived using historical trends and is re-evaluated and adjusted based on actual load data. The load curves that SDCP prepares to support this forecast evaluate and assume increases in customer energy usage due to transportation electrification ~~electrification, but~~ ~~electrification but~~ currently do not separately forecast transportation electrification load growth. Based on SDCP's evaluation of transportation electrification load growth up to the date of the filing of this RPS Procurement Plan, transportation electrification has not caused deviations from the overall expected load growth trends because this specific sector of load growth has not been significant in comparison to competing factors, such as energy efficiency programs, customer-sited

generation, and general economic impacts. This same assumption is reflected in SDCP's Integrated Energy Policy Report ("IEPR") Demand Forecast, most recently submitted ~~on June~~ ~~June~~ 10, 2025.

However, because state and local transportation goals are likely to result in significant increases in transportation electrification in the future, SDCP will be assessing and evaluating if its near term forecasts should be adjusted based on changes likely to occur in its region. This evaluation considers light duty vehicles (personal use), electrification of vehicle fleets (commercial), and local targets for electrification of public transit systems while building electrification considers the phasing out of onsite use of natural gas for heating, cooling and other appliances in buildings through all-electric technologies. The information considered in this process includes the mid scenario identified in the California Energy Commission's Integrated Energy Policy Report ("IEPR") IEPR Demand Forecast.⁷ SDCP is evaluating the development of a transportation electrification forecast that would also incorporate other available information that would allow such a forecast to be directly tailored to its region – this data may include local policies related to transportation electrification, if applicable, locally available incentives focused on transportation electrification, or data related to electric transportation adoption occurring within SDCP's service territory. SDCP is coordinating with its member municipalities to determine pertinent local targets for transportation and building electrification and, following the identification of these local planning parameters, will accordingly update its load curves to reflect such assumptions.

IV.B.2 Curtailment Frequency, Cost, and Forecasting

⁷ See Javanbakht, Heidi, Cary Garcia, Ingrid Neumann, Anitha Rednam, Stephanie Bailey, and Quentin Gee. 2022. Final 2021 Integrated Energy Policy Report, Volume IV: California Energy Demand Forecast. California Energy Commission. Publication Number: CEC-100-2021-001-V4, at 65.

This Section responds to the questions presented in Section ~~6.13~~ IV.B.2 of the ACR⁸ and describe SDCP’s strategies and experience so far in managing SDCP’s exposure to negative pricing events, overgeneration, and economic curtailment for SDCP’s region and portfolio of renewable resources.

~~IV.B.2.(a)~~ ~~XIII.1.~~ *Factors Having the Most Impact on the Projected Increases in Incidences of Overgeneration and Negative Market Price Hours*

SDCP will continue to monitor the California energy market, including information and considerations related to energy curtailment, potential cost impacts, contracting considerations, and other concerns. The following represents SDCP’s understanding of this topic, which may impact future procurement processes.

Due in large part to the rapid increase in the amount of wind and solar generating facilities that have been brought online throughout the western United States, the California Independent System Operator’s (“CAISO”) balancing authority area has experienced an increasing frequency and magnitude of curtailment and negative pricing events. The U.S. Energy Information Agency (“EIA”) estimates that as of February 2025 ~~April 2024~~, California has 41,063 ~~37,507~~ MW of installed solar capacity, with 18,514 ~~17,193~~ MW of that total being behind-the meter solar.⁹ The CAISO reports that it has 21,042 ~~19,628~~ MW of utility-scale solar and 8,373 ~~8,352~~ MW of utility-scale wind currently installed within its balancing authority area.¹⁰

⁸ See *Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for ~~2024~~2025 Renewables Portfolio Standard Procurement Plans, ~~May 17, 2024~~ April 17, 2025* at p. ~~31-32~~19-20.

⁹ EIA, *Electric Power Monthly, Table 6.2.B. Net Summer Capacity Using Primarily Renewable Energy Sources and by State, February 2025 and 2025 (Megawatts)*, available at: https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=table_6_02_b.

¹⁰ CAISO, *What are we doing to green the grid?*, updated May 4, 2025, at <http://www.caiso.com/informed/Pages/CleanGrid/default.aspx>.

This increased capacity results in discrete periods where the generation from wind and solar resources exceeds the total load in the CAISO during those periods. The monthly maximum load served by wind and solar in the CAISO has averaged 83.8~~78.6~~% over the past 3 years (March 2022~~May 2021~~ to March 2025~~May 2024~~), and in April of 2024 the monthly maximum load served by wind and solar was 109.6 percent,¹¹ while the maximum 5-minute amount of all renewables serving load was 117.3 percent.¹² To address the resulting instances of over-supply, the amount of curtailment of wind and solar in the CAISO has significantly increased each year from 2015 through 2024, totaling 187,000 MWh in 2015, 308,000 MWh in 2016, 379,510 MWh in 2017, 461,043 MWh in 2018, 965,241 MWh in 2019, 1,586,500 MWh in 2020, 1,504,803 in 2021, 2,449,248 in 2022, ~~and~~ 2,659,527 in 2023, and 3,423,376 in 2024.¹³ As of May 4, 2025~~July 5, 2024~~, the total curtailment of solar and wind year to date is 2,314,942 ~~2,860,176~~ MWh.¹⁴ Curtailment is typically the highest during the months of March, April, and May when hydroelectric generation is historically at its highest.

SDCP will continue to monitor this situation to the extent such circumstances are likely to impact procurement activities and contract administration. If prospective renewable generating opportunities are located in areas that are prone to frequent instances of negative market pricing (based on available historical data), SDCP will be sure to evaluate such data to better understand prospective financial impacts and/or pursue contractual pricing structures that will insulate the CCA program from such risks. When SDCP considers specific renewable

¹¹ CAISO, Monthly Renewables Performance Report, May 2024, *available at* <https://www.caiso.com/documents/monthly-renewables-performance-report-may-2024.html>.

¹² CAISO, Monthly Renewables Performance Report, April 2024, *available at* <https://www.caiso.com/documents/monthlyrenewablesperformancereport-apr2024.html>.

¹³ CAISO, Managing Oversupply, Wind and Solar Curtailment Totals, updated May 4, 2025, *available at* <http://www.caiso.com/informed/Pages/ManagingOversupply.aspx>.

¹⁴ CAISO, Wind and Solar Curtailment, May 4, 2025, *available at* <https://www.caiso.com/documents/wind-solar-real-time-dispatch-curtailment-report-may-04-2025.pdf>.

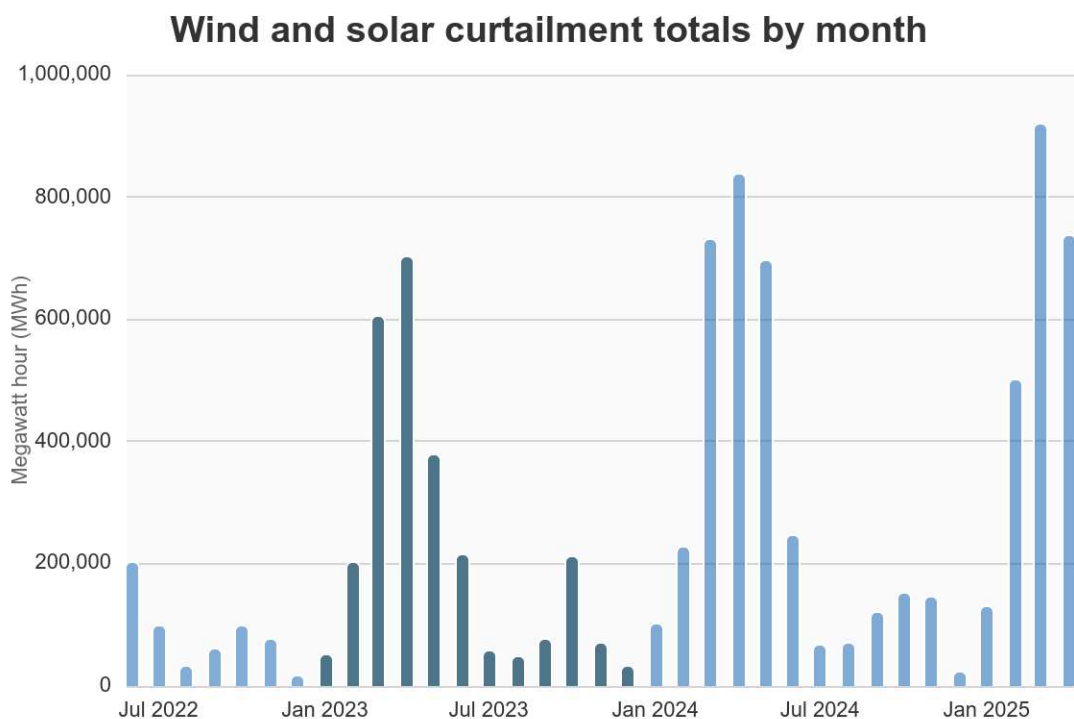
project/contract opportunities in the future, it will likely assume that incidences of over-generation will continue to occur (or increase) in areas of the state with low load and relatively high levels of generation. To the extent there are not opportunities to store, export or otherwise use such generation as it occurs, SDCP understands that market pricing would likely be suppressed to the extent that generation exceeds load; and to the extent that generation meaningfully exceeds load, market pricing could turn negative (or significantly negative). This concern was previously considered by SDCP and will continue to be considered when evaluating future renewable project/contract opportunities, and to the extent that certain project locations seem predisposed to incidences of negative pricing, SDCP will weigh such risk against other available project/contract opportunities. Ultimately, SDCP must satisfy its RPS procurement mandates and will need to procure among available opportunities, even if such opportunities present related risks to SDCP – in such instances, SDCP may seek to minimize its negative price risk through contract structures that alleviate these concerns for the buyer.

IV.B.2.(b): Written Description of Quantitative Analysis of Forecast of the Number of Hours Per Year of Negative Market Pricing for the Next 10 Years

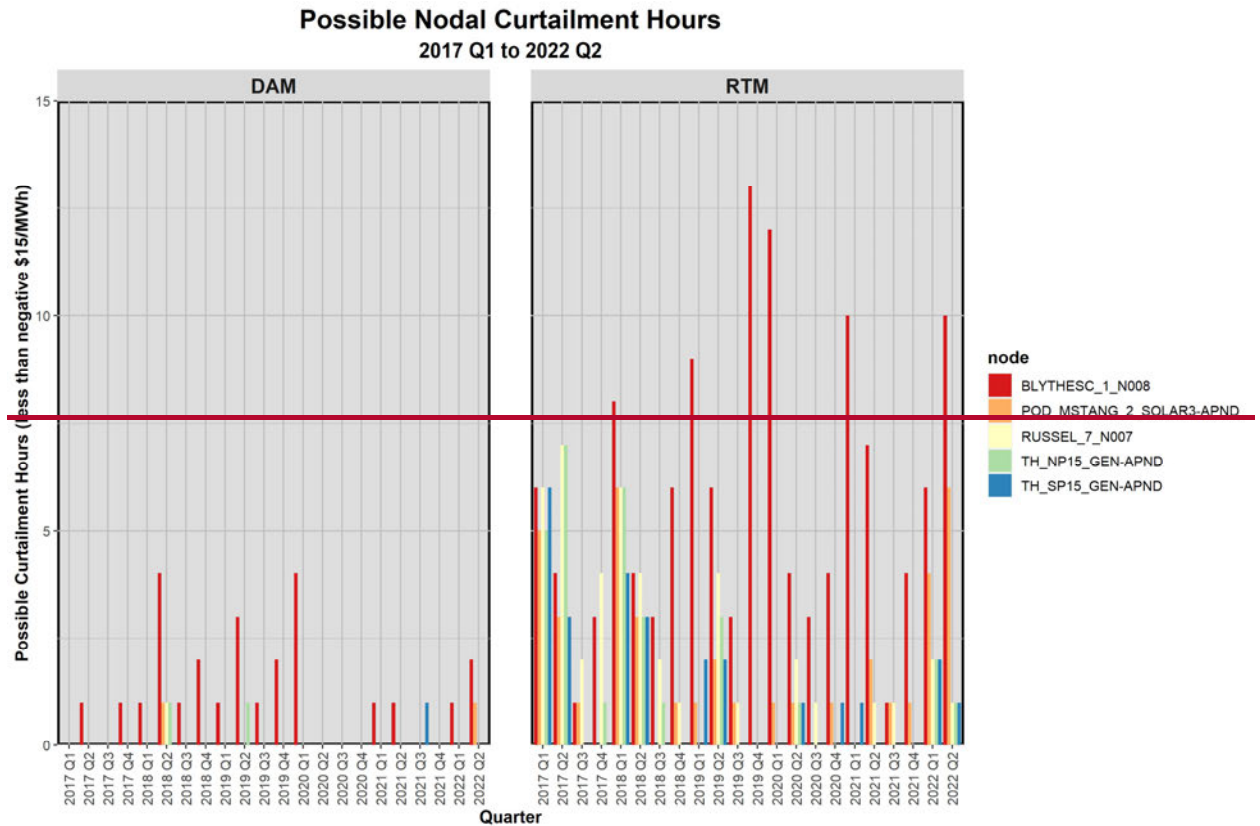
Negative prices in the CAISO market can significantly impact the cost and overall value of renewable generating assets, particularly if such supply agreements apply market-based settlement mechanisms to determine charges assessed to the buyer. Thus, it is important that SDCP consider the siting of prospective renewable generating resources to avoid taking on unforeseen costs or lower than expected delivered energy quantities, which may result from economic curtailments. For this reason, SDCP has endeavored to quantify the potential occurrence of negative pricing events within certain areas of the state that are known to include significant levels of renewable generating capacity. To improve its understanding of such risks,

SDCP has (1) evaluated CAISO curtailment reports and (2) assembled a historic negative pricing analysis with the average results of such analysis being used to inform ~~as~~ SDCP's long-term energy price forecast that includes a ten-year negative price forecast. SDCP notes that moderately negative prices are not expected to trigger meaningful economic curtailments, as the cost of procuring replacement RPS supply under index-plus pricing arrangements would likely be equivalent in cost; in such instances, there would be little sense for SDCP to curtail renewable energy deliveries.

Below is the latest CAISO chart showing ~~are several charts which illustrate~~ the number



of potential historic curtailment events ~~that would have been triggered when nodal prices fell significantly negative~~. Curtailment volumes have increased in the spring consistently for the past three years and that trend is expected to continue until more batteries are available on the CAISO system. ~~Estimates for the real-time market (RTM) have been averaged over the hour to promote comparability between day-ahead and RTM outcomes.~~



Using the historic data illustrated above, SDCP has created ~~the following~~ a nodal forecast that factors in the correlation of nodal pricing to hub pricing and CAISO curtailment incidents. This forecast will be ~~considered if~~ used to model future project opportunities ~~are located adjacent to the specified~~ to determine the ~~-project specific curtailment profile~~ nodes. ~~If eventual project opportunities happen to be located in other geographic areas, SDCP would update its analysis based on the node in closest proximity to the prospective generating resource.~~ This forecast methodology allows SDCP to estimate the quantity of time energy will be curtailed from a renewable energy project and its impacts on both portfolio economics and the as-risk volumes for renewable deliveries. ~~Because curtailment hours occur frequently within the real time market, SDCP has also included a sample of its analyses for a subset of nodes that are known to be in close proximity to areas of the state in which prevalent renewable generation buildout has occurred. The color shading in the table is a visual cue reflecting curtailment density in certain~~

hours of the year. This density will be helpful in determining the delivery profiles that may complement existing generating resources adjacent to the node as well as those that may exacerbate negative pricing. SDCP is mindful that it will need to annually evaluate relevant variables, such as regional hydrologic conditions and generalized weather trends, to determine if any adjustments ought to be made to its forecast.

BLYTHESC_1_N008 RTM													
Hour	January	February	March	April	May	June	July	August	September	October	November	December	
1	.17	.50	.00	.17	.17	.00	.20	.20	.20	.00	.40	.20	
2	.17	.17	.00	.00	.00	.33	.00	.20	.00	.00	.20	.20	
3	.00	.17	.00	.00	.17	.17	.20	.20	.00	.00	.20	.00	
4	.00	.17	.00	.00	.00	.00	.00	.00	.00	.00	.20	.00	
5	.00	.00	.17	.00	.00	.00	.20	.20	.00	.00	.20	.00	
6	.17	.00	.00	.00	.33	.50	.20	.00	.00	.00	.40	.00	
7	.00	.00	.00	.00	.50	1.00	.40	.20	.20	.00	.00	.40	
8	.17	.50	.00	1.00	1.50	1.83	1.40	.40	.40	.40	.40	.80	
9	.83	1.67	1.50	3.17	3.33	1.50	.40	.40	1.00	1.20	1.60	1.80	
10	1.17	2.67	2.67	2.33	3.33	.67	.20	.40	1.60	2.20	2.60	3.60	
11	2.67	3.00	3.00	2.50	2.17	.67	.00	.20	1.20	2.20	2.20	4.00	
12	.83	2.83	2.50	2.83	2.17	.00	.20	.20	.80	2.40	2.60	2.60	
13	3.00	3.17	4.50	1.33	1.33	.00	.00	.00	.60	1.00	2.20	2.60	
14	1.00	3.83	4.33	2.17	1.33	.17	.00	.20	.60	2.40	1.20	2.40	
15	1.00	1.17	1.33	1.67	.83	.50	.20	.00	.40	1.60	2.00	2.40	
16	.67	3.00	3.00	1.50	.67	.00	.00	.00	.20	.80	1.40	.00	
17	.17	.17	3.00	1.50	1.00	.00	.00	.00	.00	.20	.60	.40	
18	.50	.17	.67	.17	.50	.00	.00	.00	.20	.00	.60	.80	
19	.17	.17	.17	.00	.00	.00	.00	.00	.20	.00	.80	.80	
20	.67	.50	.00	.00	.00	.00	.00	.20	.20	.00	.60	.40	
21	.67	.17	.00	.00	.17	.17	.00	.20	.60	.00	.60	.20	
22	.33	.50	.17	.00	.17	.33	.00	.00	.40	.00	1.00	.60	
23	.33	.17	.00	.00	.00	.17	.20	.00	.60	.00	.40	.20	
24	.17	.67	.33	.00	.00	.00	.00	.60	.20	.00	.40	.00	
Total Monthly Incidents of Neg.Pricing	14.83	28.33	30.33	20.33	19.67	8.00	3.80	3.80	9.60	14.40	22.80	24.40	
Average Monthly Incidents of Neg.Pricing	1.19	2.27	2.43	1.63	1.57	.64	.30	.30	.77	1.15	1.82	1.95	
Annual Adjustment Factor to be applied across 10-year forecast	7.41%	14.15%	15.14%	10.15%	9.82%	3.99%	1.90%	1.90%	4.79%	7.19%	11.38%	12.18%	

RUSSEL_7_N007 RTM													
Hour	January	February	March	April	May	June	July	August	September	October	November	December	
1	.17	.17	.00	.83	.50	.33	.20	.40	.00	.00	.00	.40	
2	.17	.17	.00	.83	.83	.50	.40	.20	.00	.00	.00	.40	
3	.00	.33	.00	.83	1.00	.17	.40	.40	.00	.00	.00	.40	
4	.00	.17	.00	.50	.83	.17	.20	.40	.00	.00	.00	.40	
5	.00	.00	.17	.50	.50	.00	.20	.20	.00	.00	.00	.40	
6	.00	.00	.00	.50	.50	.17	.20	.20	.00	.00	.00	.60	
7	.00	.00	.00	.50	.33	.83	.20	.20	.00	.00	.00	.80	
8	.00	.00	.00	.83	.33	.50	.40	.20	.20	.00	.00	.40	
9	.00	.50	.33	1.17	1.00	.50	.20	.20	.00	.00	.00	.40	
10	.00	1.00	.33	1.33	.67	.67	.00	.00	.00	.00	.00	.40	
11	.00	1.00	.67	.83	.67	.67	.00	.00	.00	.20	.00	.40	
12	.17	.33	.17	.67	1.00	.17	.00	.00	.00	.00	.00	.40	
13	.17	.17	.50	1.33	.50	.17	.00	.00	.00	.00	.00	.40	
14	.17	.17	1.00	1.17	.33	.17	.00	.00	.00	.00	.00	.20	
15	.17	.67	1.50	1.00	.67	.17	.00	.00	.00	.00	.00	.20	
16	.00	.83	2.17	1.00	.67	.17	.00	.20	.00	.00	.00	.20	
17	.00	.33	1.17	1.17	.67	.33	.20	.00	.20	.00	.00	.20	
18	.00	.00	.50	.33	1.00	.17	.00	.00	.20	.20	.00	.40	
19	.00	.00	.17	.50	.50	.33	.20	.00	.00	.00	.00	.40	
20	.00	.00	.00	.83	.33	.17	.00	.20	.00	.00	.00	.40	
21	.00	.00	.00	1.00	.17	.67	.20	.00	.20	.00	.00	.40	
22	.00	.17	.00	1.17	.33	.50	.20	.20	.00	.00	.00	.40	
23	.00	.17	.00	.83	.33	.17	.00	.20	.20	.00	.00	.40	
24	.00	.50	.33	1.67	.67	.33	.00	.20	.00	.00	.00	.40	
Total Monthly Incidents of Neg.Pricing	1.00	6.67	9.00	21.33	14.33	8.00	3.20	3.20	1.00	.40	.00	9.40	
Average Monthly Incidents of Neg.Pricing	.08	.53	.72	1.71	1.15	.64	.26	.26	.08	.03	.00	.75	
Annual Adjustment Factor to be applied across 10-year forecast	1.29%	8.60%	11.61%	27.52%	18.49%	10.32%	4.13%	4.13%	1.29%	0.52%	0.00%	12.12%	

~~IV.B.2.(c)~~~~XIII.3.~~ Experience, to Date, With Managing Exposure to Negative Market Prices and/or Lessons Learned from Other Retail Sellers in California

SDCP understands the exposure to negative price risk and that it should pay close attention to historical nodal energy prices near areas where prospective renewable generating facilities may be located. Gathering such information will facilitate an improved understanding of the frequency and significance of instances involving negative pricing and may influence project rankings within SDCP-administered solicitation processes. SDCP understands that negative pricing is more prevalent in certain geographic regions throughout the state, so contracting with generating resources located within or adjacent to such areas may expose the organization to higher-than-expected renewable energy and compliance costs. SDCP is aware that certain contract structures, including “index-plus” pricing arrangements, may substantially minimize the financial impacts related to negative pricing. For example, numerous CCAs have pursued the use of index-plus pricing structures and, as a result, such contracts are generally insulated from instances involving negative market prices and/or curtailment risk. Another effective mitigation measure for negative price risk is the co-located installation of battery storage infrastructure with intermittent renewable generating capacity. Such infrastructure generally allows the buyer to shift some or all of the renewable energy production away from times of day when negative pricing can be particularly prevalent, allowing for the delivery of such power at times of day when market pricing is higher. SDCP has evaluated contracting with curtailment bid cap arrangements, as well as the inclusion of energy storage infrastructure, to minimize the risk of curtailment and negative pricing. In fact, all of SDCP’s initial long-term renewable energy supply contracts for solar generation incorporate the use of battery storage to facilitate the shifting of production curves to better align with customer energy use and market

pricing conditions. During its solicitation processes, SDCP will evaluate negative pricing history, as needed, for project opportunities that may expose the organization to such risks.

SDCP is pursuing a diversified portfolio of RPS contracts that seek to utilize a variety of contract structures, generating technologies, resource locations, suppliers, risk allocation mechanisms, and other considerations.

~~*IV.B.2.(d)XXX.4. Direct Costs Incurred, to Date, for Incidences of Overgeneration and Associated Negative Market Prices*~~

Based on current supply contracts, SDCP has yet to incur direct costs related to negative pricing (for incidences of overgeneration associated with renewable generating facilities).
However, there has been indirect cost related to curtailments of index-plus contracts that reduce delivery volumes.

~~*IV.B.2.(e)XXX.5. An Overall Strategy for Managing the Overall Cost Impact of Increasing Incidences of Overgeneration and Negative Market Prices*~~

The direct costs associated with incidences of overgeneration are an unfortunate reality. It is the goal of SDCP to minimize these costs wherever possible by investigating mitigation strategies and learning lessons to avoid negative pricing through certain contracting mechanisms and operational strategies. While curtailment is a viable renewable integration strategy that is generally more cost-effective than other options, there are potential negative consequences from excessive curtailment. Curtailment of solar and wind represents a lost opportunity to generate zero GHG-emitting electricity, and excessive curtailment could impact the ability of the state to meet its environmental and energy policy goals. Additionally, these over-supply situations expose ratepayers to increased costs because their LSEs must either economically curtail the

generating resource (and often pay for the electricity that was not generated) or generate power and be exposed to negative prices. Because these conditions are largely driven by state policy, it is appropriate to consider macro-level mitigation measures through CAISO initiatives, Commission rulemakings, and possibly even legislation. There are a number of measures and policies that have already been implemented or are currently being pursued that will have significant impacts on curtailment in the future. This includes the expansion of the Energy Imbalance Market, improvements to the CAISO market design, enhanced forecasting capabilities, time-of-use rates, improved EV charging functionalities, smart deployment of distributed energy resources, and furthered regional integration. The Commission's IRP proceeding will be an appropriate forum to measure the impact of these policies and the effect that they will have on future curtailment. These new measures will need to be modeled and incorporated into forecasts of future curtailment.

~~IV.B.2.(f)~~~~XIII.6.~~ *Contract Terms Included in RPS Contracts Intended to Reduce the Likelihood of Curtailment or Protect Against Negative Prices.*

As described elsewhere in this RPS Procurement Plan, SDCP is aware of potential cost, compliance, and environmental impacts of negative market prices and associated curtailment of renewable resources. SDCP is building its supply portfolio with the intent to limit SDCP's exposure to negative pricing. SDCP has incorporated a number of strategies and relevant contract provisions to further reduce curtailment and negative price risk. Primarily, SDCP has not signed a PPA with a solar-only (i.e. not co-located or hybridized with energy storage) generating facility that exposes SDCP to any market price exposure; instead, SDCP has preferred to contract with solar-plus-storage hybrid facilities. When contracting for solar or wind output not associated with hybrid or co-located facilities, SDCP has pursued index-plus

pricing structures or fixed-volume contracts to ensure the same protection against negative prices and reductions in deliveries due to curtailment. When contracting with hybrid facilities that result in exposure to market prices, SDCP has maintained full dispatch rights of the facility to ensure that it can shift deliveries from negatively priced intervals and into higher priced periods, both to increase market revenues received and to reduce the magnitude of curtailed renewable generation. SDCP is likely to employ these strategies in future contracting while monitoring, exploring, and evaluating additional techniques to hedge against these potential outcomes.

IV.C. Portfolio Optimization

SDCP's goal is to meet organizational policies, reliability requirements, and statewide procurement mandates in a manner that is both cost effective and supportive of a well-balanced resource portfolio. Portfolio optimization strategies can help reduce costs and should facilitate alignment of SDCP's portfolio of resources with its forecasted load needs. To support this goal, SDCP considers the following strategies:

- **Purchases from Retail Sellers:** Purchases of RPS-eligible renewable energy (via resale) from other retail sellers can provide a cost-effective way of meeting short-term resource needs or filling in gaps in procurement while long-term projects are under development.
- **Sales Solicitations:** As SDCP's portfolio of resources continues to develop, it will also consider offering solicitations of sales to other retail sellers, if the disposition of surplus is deemed desirable. SDCP's willingness to pursue such sales will be dependent upon its ongoing monitoring of RPS positions, prospective sales pricing, and direction received from its Governing Board and executive management.

- **Optimizing Existing Procurement:** As SDCP considers its long-term resource needs, it may evaluate options in its future power purchase agreements to increase the output of existing generating facilities through technological upgrades, by adding new capacity to an existing generator or by adding energy storage infrastructure to an existing renewable generator. Expanding existing facilities may provide additional generation at reduced costs with lower risks of project failure because the need for distribution system upgrades and permitting may be reduced – such opportunities may be pursued as deemed appropriate by SDCP. The addition of energy storage infrastructure to an existing renewable generator would be expected to enhance grid reliability as well as the value of electric energy produced by the generating facility, as the pre-storage energy delivery profile could be shifted to: 1) better align SDCP’s supply with customer demand; or 2) create more value for SDCP customers by shifting electric energy deliveries to a time of day when market revenues received would be greater. In terms of reliability impacts related to the addition of energy storage infrastructure, SDCP expects that such enhancements would meaningfully increase the proportionate level of resource adequacy capacity that could be derived from an intermittent renewable generating resource without such storage infrastructure – reductions to the net qualifying capacity of intermittent renewable generating resources are well documented and ongoing, resulting in very little capacity benefits from solar-only generating projects. In considering these sorts of enhancements, SDCP will be mindful of the need to coordinate with its resource owners to evaluate potential planning constraints (related to generator interconnection, for example) before assuming that the addition of energy storage infrastructure at an existing generating facility would be a viable option.

- **Holistic Portfolio Design and Procurement Strategy:** In light of the multiple

procurement-related compliance requirements with which California LSEs must comply

– RA (administered both by CAISO and CPUC), Integrated Resource Planning (D. ~~19-11-016~~[20-15-003](#), Mid-Term Reliability, etc.), RPS (including long-term contracting requirements), in addition to any LSE-specific incremental or voluntary program goals – SDCP is mindful to take a holistic approach to procurement efforts. Targeting resources that can satisfy multiple compliance or voluntary objectives provides for more efficient and cost-effective procurement than alternative approaches that may target individual compliance products or requirements one-by-one without consideration of synergies or economies of scale that may result from resources that can deliver products to satisfy multiple program requirements and evaluating projects and proposals as such to ensure that the co-benefits and efficiencies of such procurement are correctly incorporated.

On June 24, 2021, the Commission adopted [Mid-Term Reliability \(“MTR”\) Requirements through](#) -D.21-06-035, which directed all retail sellers to procure 11,500 MW of new net qualifying capacity (“NQC”) between 2023 and 2026 and assigned each retail seller a specific procurement responsibility based on its share of peak demand. SDCP’s total obligation is 570 MW, which must include minimum amounts of procurement from certain subcategories: (1) 124 MW from firm, zero-emitting capacity by 2025; (2) 50 MW from long duration storage resources by 2028; and (3) 49 MW from firm, non-fossil fueled baseload generating resources by 2028.

Pursuant to the allowance in D.21-06-035 for retail sellers within the same Transmission Access Charge (“TAC”) area to reallocate procurement obligations upon mutual agreement, SDCP and SDG&E have collaborated to revise their obligations in D.21-06-035, which were

based on preliminary load forecasts that have since been refined. SDG&E filed the revised, mutually agreed capacity requirements to the CPUC on March 16, ~~2022~~~~2022~~~~2022~~, via Advice Letter 3967-E. This advice letter was suspended and later approved in June 2022. The mutually agreed reallocation of the procurement obligations resulted in a total obligation of 455.7 MW for SDCP, which must include minimum amounts of procurement from certain subcategories: (1) 98.9 MW from firm, zero-emitting capacity by 2025; (2) 40 MW from long duration storage resources by 2028; and (3) 39.3 MW from firm, non-fossil fueled baseload generating resources by 2028. Additionally, on February 23, 2025, the Commission adopted D. 23-02-040 ordering supplemental MTR procurement for SDCP of 80 MW for both 2026 and 2027.

SDCP's ~~expects that~~ contracts executed pursuant to its 2020 Long-term RPS solicitation ~~will~~ fulfilled a portion of its 2023~~and 2024~~ ~~2025~~ obligations. These volumes ~~will be~~ were supplemented by additional volume from VAMO and IOU market offer contracts along with other short-term contracts. SDCP's Long-term RPS solicitations ~~in 2022and 2023~~ ~~from 2022 to 2025~~ focused on meeting any remaining procurement obligations from D.21-06-035 ~~and D. 23-02-040~~. SDCP submitted its most recent MTR compliance filing on June 2, 2025 in the IRP proceeding (D. 20-05-003).

IV.C.1 Conformance with the IRP Proceeding

The resources identified in this RPS Procurement Plan are consistent with resources that will be ~~were~~ identified in SDCP's 2025~~most recent~~ IRP, which will be~~was~~ approved by SDCP's governing board and provided to the Commission for certification by~~on~~ November 1, 2025~~2022~~, and with SDCP's Updated IRP, which was submitted to the Commission on October 16, 2023.

As required by the ACR, SDCP includes the following table that describes how SDCP's 2025~~2024~~ RPS Procurement Plan conforms with the determinations made in the IRP proceedings

(R.16-02-007 and ~~R.20-05-003 and D.24-02-047~~). As required, SDCP will highlight the interrelationships of its RPS and IRP planning processes in a future iteration of this RPS Procurement Plan. The following table reflects SDCP's most recent updates, as reflected in its RPS Procurement Plan, regarding RPS alignment with the IRP process.

<u>IRP Section Subsection</u>	<u>RPS Alignment in IRP</u>	
<u>III. Study Results</u> <u>A. Preferred and Conforming Portfolios</u>	<u>Retail sellers should explain how the RPS resources they plan to procure, outlined in their RPS Plan, will align with each portfolio to be developed in their IRP. In addition to the list of the IRP portfolios developed and portfolio descriptions submitted for Commission approval and certification in IRP Plans, this should include:</u>	
	<table> <tr> <td> <u>1. Existing RPS resources that the retail seller owns or contracts.</u> <u>2. Existing RPS resources that the retail seller plans to contract with in the future.</u> <u>3. New RPS resources that the retail seller plans to invest in.</u> <u>4. New and existing resources that will be used to meet Mid-Term Reliability obligations adopted in D.21-06-035 and the supplemental procurement ordered in D.23-02-040.</u> </td><td> <u>As part of its 2022 IRP filing, SDCP submitted two Preferred Conforming Portfolios that achieve its proportional share of both the 30 and 25 MMT GHG targets by 2035. These targets were in addition to the requirements in D.22-02-004 which require LSEs to meet their proportional share of the 2030 target of 38 MMT and plan for a 2030 target of 30 MMT. Because SDCP has yet to finalize its initial long-term RPS supply commitments that will contribute to the achievement of such portfolio goals, this document reflects those resources that SDCP intends to contract with in the future. Such procurement efforts are expected to contribute to the achievement of relevant GHG targets as well as RPS procurement requirements, including the 65% long-term contracting requirement.</u> <u>Description of 2022 Conforming Portfolios:</u> • <u>30 MMT Conforming Portfolio: Portfolio that achieves SDCP's proportional share of a 30 MMT statewide GHG target.</u> ○ <u>The 30 MMT Conforming Portfolio assumed the use of new RPS resources not yet placed under contract, including: 1,425 MW of new hybrid resources (which would include 750 MW of</u> </td></tr> </table>	<u>1. Existing RPS resources that the retail seller owns or contracts.</u> <u>2. Existing RPS resources that the retail seller plans to contract with in the future.</u> <u>3. New RPS resources that the retail seller plans to invest in.</u> <u>4. New and existing resources that will be used to meet Mid-Term Reliability obligations adopted in D.21-06-035 and the supplemental procurement ordered in D.23-02-040.</u>
<u>1. Existing RPS resources that the retail seller owns or contracts.</u> <u>2. Existing RPS resources that the retail seller plans to contract with in the future.</u> <u>3. New RPS resources that the retail seller plans to invest in.</u> <u>4. New and existing resources that will be used to meet Mid-Term Reliability obligations adopted in D.21-06-035 and the supplemental procurement ordered in D.23-02-040.</u>	<u>As part of its 2022 IRP filing, SDCP submitted two Preferred Conforming Portfolios that achieve its proportional share of both the 30 and 25 MMT GHG targets by 2035. These targets were in addition to the requirements in D.22-02-004 which require LSEs to meet their proportional share of the 2030 target of 38 MMT and plan for a 2030 target of 30 MMT. Because SDCP has yet to finalize its initial long-term RPS supply commitments that will contribute to the achievement of such portfolio goals, this document reflects those resources that SDCP intends to contract with in the future. Such procurement efforts are expected to contribute to the achievement of relevant GHG targets as well as RPS procurement requirements, including the 65% long-term contracting requirement.</u> <u>Description of 2022 Conforming Portfolios:</u> • <u>30 MMT Conforming Portfolio: Portfolio that achieves SDCP's proportional share of a 30 MMT statewide GHG target.</u> ○ <u>The 30 MMT Conforming Portfolio assumed the use of new RPS resources not yet placed under contract, including: 1,425 MW of new hybrid resources (which would include 750 MW of</u>	

		<u>battery storage to promote grid reliability); 550 MW of new wind resources; and 100 MW of new geothermal resources.</u> ○ <u>The 30 MMT Conforming Portfolio also assumed the use of existing RPS resources not yet placed under contract, including: 250 MW of existing wind resources.</u> ○ <u>SDCP's 30 MMT portfolio conformed to the procurement timing, resource quantities, and general resource attributes identified in the 30 MMT reference system plan.</u> ● <u>25 MMT Conforming Portfolio: Portfolio that achieves SDCP's proportional share of a 25 MMT statewide GHG target.</u> ○ <u>The 25 MMT Conforming Portfolio assumed the use of new RPS resources not yet placed under contract, including: 1,425 MW of new hybrid resources (which would include 750 MW of battery storage to promote grid reliability); 550 MW of new wind resources; and 100 MW of new geothermal resources.</u> ○ <u>The 25 MMT Conforming Portfolio also assumed the use of existing RPS resources not yet placed under contract, including: 250 MW of existing wind resources.</u> ○ <u>SDCP's 25 MMT portfolio conformed to the procurement timing, resource quantities, and general resource attributes identified in the 25 MMT reference system plan.</u> <u>Meeting the Mid-Term Reliability obligations from D.21-06-035:</u>
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- ~~SDCP expects to meet~~ SDCP expects to meet the Mid-Term Reliability (“MTR”) cumulative obligations ~~by 2025~~ for 2023-2025 via resources that are currently under contract ~~(scheduled to achieve commercial operation in 2024 or 2025) or under negotiation~~ that achieved commercial operation by 2025. SDCP’s RPS RFO’s in Q4 2022 and Q1 2023 targeted resources that could address any outstanding requirements for resources to be online in 2025 or, should they present, in 2023 or 2024. After experiencing project delays, SDCP also procured short-term bridge capacity to close its short position for 2023-2025 and ultimately meet the compliance requirements by the June 2, 2025 MTR filing. With respect to Long Leadtime obligations for resources to be online in 2026, SDCP closed its solicitation on July 6, 2022 for “clean firm” resources and closed another solicitation for stand-alone storage, including long-duration energy storage resources, in Q2 2023. SDCP notes that per D.23-2-040, see below, these long lead time obligations are now for resources to be online by 2028.

Meeting the Mid-Term Reliability obligations from D.23-02-040:

- SDCP expects to meet the additional Mid-Term Reliability (“MTR”) obligations for D.23-02-040, via resources that are under negotiation from its 2023 Long-Term RPS RFO seeking projects with CODs through 2028. Additionally, SDCP is in negotiation with projects from its 2023 Stand-Alone Storage RFO.

		<u>for long-duration storage projects that would be considered long-lead time resources needed by 2028 under D.23-02-040. SDCP also issued a 2025 Clean-Firm RFO seeking offers for resources that would meet the long lead time obligations to be online by 2031.</u>
<u>IV. Action Plan</u> <u>A. Proposed Activities</u>	<u>Retail sellers should describe how they propose to use RPS resources to implement their Preferred Portfolio. Narratives should include:</u>	
	<u>1. Proposed RPS procurement activities as required by Commission decision or mandated procurement.</u> <u>2. Description of RPS resources identified in the Study Results section that correspond to proposed activities.</u> <u>3. Procurement plans, potential barriers, and resource viability for each new RPS resource identified.</u>	<u>To ensure compliance with its GHG and RPS targets, SDCP plans to substantially rely on GHG-free and RPS-eligible resources while contributing to statewide reliability requirements and responsibly managing overall portfolio costs. This approach is generally consistent between the 30 MMT Conforming Portfolio and 25 MMT Conforming Portfolio in the 2022 IRP Plan.</u> <u>In its IRP, SDCP also established that its planned incremental capacity exceeds its pro rata share of capacity that may be needed for replacement of Diablo Canyon. These resources are further described in SDCP's 2022 IRP and, following collaboration with SDG&E to realign MTR procurement obligations and associated procurement and contract administration, SDCP maintains the expectation that its capacity from resources under contract and currently in negotiation will exceeded requirements related to replacement of Diablo Canyon through resources under contract that came online in 2024.</u> <u>SDCP expects to administer future solicitation processes to fill outstanding resource needs required to meet portfolio specifications reflected in its 30 MMT and 25 MMT Preferred Conforming Portfolios as well as ongoing RPS procurement obligations. As noted elsewhere in this RPS Procurement Plan, SDCP will update the Commission with regard to the outcomes of its current long-term RPS contract negotiations in a future iteration of this</u>

		<u>planning process.</u> <u>SDCP does not foresee any barriers or viability concerns related to its requisite resource commitments but will advise the Commission if this impression changes over time.</u>
<u>IV. Action Plan</u> <u>B. Procurement Activities</u>	<u>The retail seller should describe the solicitation strategies for the RPS resources that will be included in their Preferred Portfolio. This description should include:</u>	
	<u>1. The type of solicitation.</u> <u>2. The timeline for each solicitation.</u> <u>3. Desired online dates.</u> <u>4. Other relevant procurement planning</u>	<u>SDCP may participate in distinct solicitations for different products (for example: specific renewable energy products, generating resources or storage infrastructure), or it may choose to solicit multiple products in the same solicitation. These solicitations will be competitive and may be similar to SDCP's initial long-term RPS solicitation, which was previously described in this RPS Procurement Plan.</u> <u>SDCP will administer future solicitations, as necessary, to promote consistency with the resource development plan identified in the IRP (for purposes of promoting achievement with state-mandated RPS targets as well as SDCP's internal targets). As noted above, SDCP anticipates administering upcoming solicitation activities consistent with the process and timeline described in Section I.</u> <u>During administration of future procurement processes, SDCP will utilize the evaluative and contract management processes (further described above in Section X and elsewhere in this Plan) to promote timely project completion and improve planning certainty.</u>
<u>IV. Action Plan</u> <u>C. Potential Barriers</u>	<u>Retail sellers should provide a summary of the barriers that will be identified in their Preferred Portfolio as they relate to RPS resources. The section should include:</u>	
	<u>1. Key market, regulatory, financial, or other resource viability barriers or risks associated with</u>	<u>SDCP does not expect any procurement barriers to impede its future contracting for new renewable energy resources, but notes that even though a balanced, diverse RPS portfolio is desirable, the limited resource availability and</u>

	<u>the RPS resources coming online in retail sellers' Preferred Portfolios.</u> <u>2. Key risks associated with the potential retirement of existing RPS resources on which the retail seller intends to rely in the future.</u>	<u>lead time required for some technology types may necessitate planning flexibility. SDCP also observes that the rigorous demands of California's RPS program, particularly the currently effective 65 percent long-term contracting mandate, may necessitate contracting activities with a portfolio of resources that will evolve considerably over time – more specifically, SDCP may need to pursue initial supply commitments with a portfolio of resources that does not exactly reflect its eventual/ideal characteristics related resource diversity and/or reliability. Pursuit of such portfolio characteristics will continue to be a work in progress during SDCP's first several procurement efforts and will evolve throughout the upcoming 10-year planning period.</u> <u>The key risk affecting SDCP's achievement of the 46 MMT and 38 MMT Preferred Conforming IRP Portfolios in the 2020 IRP Plan and the 30 MMT and 25 MMT portfolios in the 2022 IRP Plan is reliance on new resources – while SDCP intends to contract with highly experienced and qualified project developers (when new-build resources are deemed necessary), there is always a limited risk of project failure.</u> <u>In consideration of SDCP's existing RPS contract negotiation processes that will support achievement of parameters of the Preferred Conforming IRP Portfolios, it does not have any substantive concerns regarding its ability to fulfill and achieve levels of renewable energy procurement that will be required to satisfy pertinent RPS mandates or IRP targets. If such concerns happen to change in the future, SDCP will accordingly notify the Commission in a subsequent iteration of this planning process. However, SDCP wants to note that delays in network upgrades required for interconnection and deliverability could affect the whole industry and places development risk on RPS project.</u>
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IV.**C.B.2** Responsiveness to Local and Regional Policies

(i) Responsiveness to Policies of SDCP's Governing Board

SDCP is a joint powers authority that is subject to the control of its governing board and is directly accountable to its Member Agencies. SDCP supports and is committed to meeting the state's GHG reduction and renewable procurement goals, as well as supporting its Member Agency cities in meeting their respective CAP goals. Furthermore, as noted elsewhere in this RPS Procurement Plan, SDCP has adopted near-term renewable portfolio targets that aim to exceed RPS mandates. SDCP has also determined to: 1) forgo the direct purchase of PCC3 products; and 2) limit the use of PCC2 products (in favor of PCC1 products), subject to product availability and budgetary impacts. SDCP's Governing Board has decided to structure its RPS portfolio with these considerations in mind, as such an approach is expected to minimize attributed GHG emissions associated with its reported energy purchases (under California's Power Source Disclosure Program). In addition to state mandates and meeting the respective CAP goals of SDCP's Member Agencies, as detailed below, on June 23, 2022, SDCP's Governing Board adopted additional targets for its energy portfolio development, including: goals of 50 percent [green](#) (renewable [and carbon-free](#)) energy content in 2022, 75 percent in 2027, 85 percent in 2030 and 100 percent in 2035; 15 percent of energy portfolio capacity from new, distributed infill storage or solar plus storage resources within Member Agencies' territory by 2035; and 600 MW of new utility scale projects within San Diego and Imperial Counties by 2035, all of which will impact SDCP's energy portfolio strategies.

SDCP is also implementing solicitations for the Disadvantaged Communities - Green Tariff ("DAC-GT") and Community Solar Green Tariff ("CSGT"). On May 19, 2023, SDCP submitted a Tier 2 AL 13-E, seeking CPUC approval for SDCP's DAC-GT and CSGT

solicitation materials. The DAC-GT and CSGT solicitation documents include the Request for Offer (RFO) Protocol, Term Sheet, and Generation Offer Form. The Commission approved the material in June 2023. SDCP released the DAC-GT and CSGT solicitation documents in August 2023, with responses due February 24, 2024. [SDCP contracted with one project under the first DAC-GT solicitation. In _____ April 2025, SDCP released its second DAC-GT solicitation.](#)

(ii) Responsiveness to Regional Policies

As noted in the previous sub-section, SDCP is overseen by its governing board. As such, the policies adopted by SDCP's governing board serve as guiding directives for CCA operations, including the determination of renewable energy planning targets that are intended to support local policy preferences. Reducing electric utility sector GHG emissions generated by residents and businesses was a driving factor in the formation of SDCP, as well as investing in the community through local projects. The City of San Diego adopted its CAP in December 2015, which sets a goal for 100 percent renewable energy city-wide by 2035.¹⁵ The City of Encinitas adopted and updated CAP in 2020 with a goal to reduce emissions to 44 percent below 2012 levels by 2030.¹⁶ The City's establishment of a CCA program will have a significant impact on its emissions goals with a reduction of 19,465 MTCO_{2e}, the largest of the prospective reductions reflected in the updated CAP's 20 GHG reduction strategies.¹⁷ Similarly, the City of La Mesa adopted its CAP in March 2018, which set a goal to reduce emissions by 68,450 MTCO_{2e} by

¹⁵ See *Climate Action Plan*, City of San Diego, December 2015, at 35, available at https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf.

¹⁶ See *Climate Action Plan Interim Revision*, City of Encinitas, November 2020, at 1-7, available at https://encinitasca.gov/Portals/0/City%20Documents/Documents/City%20Manager/Climate%20Action/CAP_2_3_2021_final.pdf?ver=2021-02-03-151752-820.

¹⁷ See *Climate Action Plan Interim Revision*, City of Encinitas, at 3-7.

2035.¹⁸ The City of Chula Vista adopted its CAP in September 2017, and it established a goal for up to 100 percent clean energy through the formation of a CCA program.¹⁹ The City of Imperial Beach adopted a CAP in July 2019 which set a goal for 85 percent renewable energy by 2030.²⁰ SDCP's newest Member Agencies – National City and San Diego County – were also motivated in part to join SDCP as a strategy to meet their respective CAP goals and several Member Agencies are in the process of updating their CAPs. The Member Agencies intend to contribute to achieving these and future goals collaboratively by operating SDCP to provide electric energy to residential, commercial and governmental electric accounts located within their communities and delivering supportive customer programs.

IV.B.1. Long-term Procurement

~~Pursuant to Public Utilities Code section 399.13(b), from 2021 onwards, 65 percent of mandated renewable energy purchases must be sourced from contracts of 10 years or more.²¹ SDCP has been conscientiously pursuing contracting opportunities to meet this requirement and has now entered into thirteen unique long-term PCC1 supply agreements (VAMO, two Market Offers, ten PPAs), which include:-~~

¹⁸ See *Climate Action Plan*, City of La Mesa, March 13, 2018, at 45, available at https://www.cityoflamesa.us/DocumentCenter/View/11008/LMCAP_CC03132018.

¹⁹ See *Climate Action Plan*, City of Chula Vista, September 2017, at 20, available at <https://www.chulavistaca.gov/home/showdocument?id=15586>.

²⁰ See *Local Coastal Program Resilient Imperial Beach Climate Action Plan*, City of Imperial Beach, July 17, 2019, at 31, available at <https://www.imperialbeachca.gov/ApprovedClimateActionPlan2019>.

²¹ ~~Cal. Pub. Util. Code § 399.13(b)(1) (“A retail seller may enter into a combination of long- and short-term contracts for electricity and associated renewable energy credits. Beginning January 1, 2021, at least 65 percent of the procurement a retail seller counts toward the renewables portfolio standard requirement of each compliance period shall be from its contracts of 10 years or more in duration or in its ownership or ownership agreements for eligible renewable energy resources.”).~~

- ~~1) a long-term (20-year) PCC1 supply agreement with Vikings Energy Farm, LLC, executed on May 3, 2021, which will cause the delivery of approximately 250,000 MWh per year of renewable energy produced by a new 136.8 megawatt photovoltaic solar array (plus battery storage) located in Imperial County that is expected to commence commercial operation in September 2024;~~
- ~~2) a long-term (20-year) PCC1 supply agreement with JVR Energy Park, LLC, executed on June 4, 2021, which will cause the delivery of approximately 260,000 MWh per year of renewable energy produced by a new 90 megawatt photovoltaic solar array (plus battery storage) located in San Diego County that is expected to commence commercial operation in October 2026;~~
- ~~3) a long-term (15-year) PCC1 supply agreement with IP Oberon, LLC, executed on June 11, 2021, which will cause the delivery of approximately 225,000 MWh per year of renewable energy produced by a new 75 megawatt photovoltaic solar array located in Riverside County that commenced commercial operation in June 2023;~~
- ~~4) a long-term (12-year) PCC1 supply agreement with SDG&E, executed on December 20, 2021, which will cause the delivery of approximately 120,000 to 2,600,000 MWh per year of renewable energy produced by a portfolio of RPS-eligible generating resources, as listed in the contract, beginning in 2022;~~
- ~~5) a long-term (10-year) PCC1 supply agreement with Duran Mesa, LLC, executed on January 27, 2022, which will cause the delivery of approximately 170,000 MWh per year of renewable energy produced by a 50 MW share of a 105 MW wind project located in Torrance County, New Mexico that achieved commercial operation (on November 30, 2021, as reflected in the California Energy Commission's associated certificate for this project) and began delivering power to SDCP on February 1, 2022;~~

~~6) a long-term (20-year) PCC1 supply agreement with Orni 30 LLC, executed on June 29, 2023, for a new 42-megawatt photovoltaic solar array (plus 35 MW battery storage) located in Imperial County that is expected to commence commercial operation in April 2025;~~

~~7) a long-term (20-year) PCC1 supply agreement with Yellow Pine Solar III, LLC, executed on July 3, 2023, for a new 35-megawatt photovoltaic solar array (plus 35 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in October 2025;~~

~~8) a long-term (20-year) PCC1 supply agreement with CDH Vidal LLC, executed January 2, 2024, for a new 160-megawatt photovoltaic array (plus 160 MW battery storage) located in San Bernadino County that is expected to commence commercial operation in June 2026;~~

~~9) a long-term (20-year) PCC1 supply agreement with Noble Solar LLC, executed March 15, 2024, for a new 400-megawatt photovoltaic array (plus 400 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in June 2027;~~

~~10) a long-term (15-year) PCC1 supply agreement with Pelicans Jaw Solar LLC, executed May 1, 2024, for a new 440-megawatt photovoltaic array (plus 238.5 MW battery storage) located in Kern County that is expected to commence commercial operation in April 2027;~~

~~11) a long-term (15-year) PCC1 supply agreement with SunZia Wind PowerCo LLC, executed November 7, 2023, of a new 150-megawatt renewable wind energy generation, located in New Mexico;~~

~~12) Long-term (20-year) PCC1 Market Offer award from PG&E (approx. 2023-2043); and~~

~~13) Long-term (17-year) PCC1 Market Offer award from SDG&E (approx. 2023-2040).~~

~~Note that of the aforementioned projects, Duran Mesa and IP Operon have achieved commercial operation, and the noted agreements with SDG&E (VAMO and MO) and PG&E (MO) will be~~

~~exclusively supplied from existing/operational projects, which serves to de-risk a significant portion of SDCP's upcoming long-term RPS deliveries. SDCP's expansion activities in 2022 and 2023 necessitated its acceptance of certain long-term allocations available under VAMO to ensure compliance with applicable long-term contracting requirements during CP4 and beyond. It is worth noting that SDCP intends to continue focusing the significant majority of its PCC1 contracting efforts on contract durations of ten years or longer, which should contribute to the accrual of a planning reserve over time, alleviating concerns regarding long-term contract compliance. This anticipated trajectory, which includes certain of SDCP's long-term VAMO allocation elections, is reflected in the following table.~~

~~As reflected in the previous table, SDCP expects to meaningfully exceed applicable long-term RPS procurement mandates in Compliance Period 4. More specifically, for Compliance Period 4, SDCP expects to procure in excess of 140% of its required long-term RPS mandate (which means that SDCP expects to procure 91% of total statutorily mandated RPS purchases from long-term contracts), based on expected long-term RPS deliveries of over 8,500 GWh, relative to a projected long-term procurement obligation of about 6,100 GWh. Similarly, in Compliance Period 5, which includes calendar years 2025 through 2027, SDCP also expects to procure in excess of [REDACTED] of its required long-term RPS mandate (which means that SDCP again expects to procure greater than [REDACTED] of total statutorily mandated RPS purchases from long-term contracts), based on expected long-term RPS deliveries of over [REDACTED], relative to a projected long-term procurement obligation of [REDACTED]. In Compliance Period 6, which includes calendar years 2028 through 2030, SDCP expects to procure about 175% of its required long-term RPS mandate (which means that SDCP again expects to procure approximately 114% of total statutorily mandated RPS purchases from long-term contracts),~~

~~based on expected long-term RPS deliveries of approximately 16,600 GWh, relative to a projected long-term procurement obligation of approximately 9,400 GWh.~~

~~These projections are based on estimated annual deliveries to be received under SDCP's long-term VAMO supply agreement with SDG&E, which was executed on December 20, 2021.~~

~~While SDCP previously advised the Commission of its intent to accept certain long-term RPS volumes under VAMO, this agreement has now been finalized. SDCP has also accepted long-term MO award volumes that will contribute to these compliance periods, as well as new build-renewable development projects. The previous procurement estimates have accounted for the net impact of SDCP's VAMO supply to overall renewable energy purchases, and SDCP believes it would successfully achieve compliance with long-term RPS procurement mandates through 2030 under a variety of adverse scenarios in which severe delivery shortfalls could occur.~~

~~Even with long-term RPS deliveries expected to meaningfully exceed applicable mandates,~~

~~SDCP expects to continue the selective pursuit of additional long-term RPS contracting opportunities via independently administered solicitations and bilateral contracting discussions.~~

~~Future long-term RPS contracting efforts are likely to focus on diversifying SDCP's RPS supply portfolio and may include additional hybrid generating configurations, baseload renewable-generating technologies, and emerging renewable-generating technologies that would be expected to promote budgetary certainty and grid reliability.~~

IV.C. Portfolio Diversity and Reliability

~~Power purchased from power marketers, public agencies, generators, CCAs, or utilities will be a source of supply for SDCP's operation. Based on current contracting efforts, SDCP expects to obtain requisite electricity supply from several suppliers, including power marketers, project developers, and/or IOUs. Such suppliers will be responsible for delivering a portion of~~

~~SDCP's intended resource mix, including SDCP's desired quantities of renewable and carbon-free energy, to provide a stable and cost-effective resource portfolio.²²~~

~~— In carrying out its planning functions, SDCP will also consider the deliverability characteristics of its future generating resources placed under contract (such as the resource's dispatchability, available capacity, and typical production patterns) and will review the respective risks associated with short- and long-term purchases as part of its forecasting and procurement processes. These efforts should lead to a more diverse resource mix, address grid integration issues, and provide value to the Member Agencies. The lack of deliverability, especially in its local region, provides risks and challenges that need to be considered in effective procurement and portfolio planning. Current backlogs place risk on project viability as even projects with deliverability status can have their net qualifying capacity cut for up to 10 years by CAISO, placing risk on revenues from the project or putting that risk on LSEs such as SDCP.~~

~~— SDCP intends to utilize a portfolio risk management approach as part of its power purchasing program, seeking low-cost supply (based on then-current market conditions) as well as diversity among technologies, production profiles, project sizes and locations, counterparties, lengths of contract, and timing of market purchases. For its recently executed long-term renewable supply agreements with new generating resources, SDCP has reflected a risk-adjustment (failure/under-delivery rate) of 5 percent in year one and 3 percent in each year thereafter. The larger year one adjustment is intended to account for potential late deliveries (resulting from delayed commercial operation), while the smaller ongoing risk adjustments are intended to account for resource intermittency and the potential for lower than anticipated~~

²² See *San Diego Community Power Community Choice Aggregation Implementation Plan and Statement of Intent*, December 9, 2019, p.1 at 6.6, available at <http://sdcommunitypower.org/resources/key-documents/>.

energy production. These assumptions were informed by discussions with other CCA organizations.—

While SDCP is not opposed to considering emerging renewable generating technologies, SDCP has yet to receive credible and cost-competitive proposals from emerging renewable generating technologies, but if such proposals arrive in the future, they will be closely considered alongside other viable options. SDCP's renewable supply commitments must result in reliable, cost-effective supply to promote compliance with applicable RPS mandates without bearing the risks typically associated with newer technologies. Until compelling proposals for emerging renewable generating technologies are received, SDCP will likely exhibit preferences for proven generating technologies and supply structures that will minimize delivery risk during early stage operation while allowing for re-shaping of certain renewable generating profiles to better align supply with demand. If, however, a compelling offer is presented for a cost-effective emerging technology, SDCP will evaluate such proposal on its merits relative to other available offers.—

SDCP will procure renewable and other requisite energy products, as necessary, to ensure that the future energy needs of its customers are met in a reliable and cost-effective manner, consistent with applicable compliance mandates. SDCP, through its CCA Implementation Plan and subsequent planning discussions, has established initial procurement targets for requisite renewable energy supply, including subcategories for various renewable energy products, and has also established targets for related planning reserves as described elsewhere in this document. To the extent that SDCP's energy needs are not fulfilled through the use of renewable generating resources, it should be assumed that such supply will be sourced from carbon-free and/or conventional energy resources, such as hydroelectric or natural gas generating technologies, as well as system power purchases.—

A key component of SDCP's planning process relates to the analysis and consideration of expected load obligations with the objective of closely balancing supply and demand, rate stability, and overall budgetary impacts. This process primarily focuses on the compilation and analysis of historical customer data, as provided by SDG&E, identification of any ineligible or excluded accounts (that will not be enrolled in CCA service), and related refinements to SDCP's retail sales forecasts. Similar to most CCAs, SDCP expects that such historical data will not be a perfect predictor of future customer energy requirements, so it intends to actively monitor actual customer usage over time, refining such forecasts as well as its ability to minimize variances between procured energy quantities and actual usage. SDCP also plans to maintain portfolio coverage targets of up to 100 percent (of expected customer energy requirements) in the near-term (0 to 2 years) but will leave larger open positions in the mid- to long-term, consistent with generally accepted industry practices.—

———At this time, SDCP has no explicit preference for specific renewable generating technologies and will consider all responses to its solicitations with the goal of assembling a diversified renewable energy supply portfolio that will deliver energy in a profile that is generally consistent with SDCP's anticipated load shape—SDCP's growing portfolio of renewable supply commitments will be increasingly considerate of load/resource balances and will attempt to promote such balance to the greatest practical extent. SDCP is also aware that use of intermittent renewable generating technologies has the potential to create occasional misalignments between customer energy consumption and related power production as well as the general quantity of renewable energy received from such projects. SDCP expects that its voluntary commitment to a minimum 50 percent renewable supply portfolio will protect against this uncertainty. In addition, and for purposes of promoting better alignment of customer energy—

usage and expected energy deliveries, SDCP is considering both stand-alone storage and hybrid or co-located storage and renewable energy projects via its ongoing Local RFI, targeted storage RFPs, and its continuing all-source RPS RFPs.

SDCP forecasts its future load growth by applying a fixed annual increase of approximately 1.7% in retail sales as compared to the prior year. This forecast value was derived using historical trends and is re-evaluated and adjusted based on actual load data. The load curves that SDCP prepares to support this forecast evaluate and assume increases in customer energy usage due to transportation electrification, but currently do not separately forecast transportation electrification load growth. Based on SDCP's evaluation of transportation electrification load growth up to the date of the filing of this RPS Procurement Plan, transportation electrification has not caused deviations from the overall expected load growth trends because this specific sector of load growth has not been significant in comparison to competing factors, such as energy efficiency programs, customer-sited generation, and general economic impacts.

However, because state and local transportation goals are likely to result in significant increases in transportation electrification in the future, SDCP will be assessing and evaluating if its near-term forecasts should be adjusted based on changes likely to occur in its region. This evaluation considers light duty vehicles (personal use), electrification of vehicle fleets (commercial), and local targets for electrification of public transit systems while building electrification considers the phasing out of onsite use of natural gas for heating, cooling and other appliances in buildings through all electric technologies. The information considered in this process includes the mid-scenario identified in the California Energy Commission's Integrated Energy Policy Report

~~(“IEPR”) Demand Forecast.²³ SDCP is evaluating the development of a transportation electrification forecast that would also incorporate other available information that would allow such a forecast to be directly tailored to its region—this data may include local policies related to transportation electrification, if applicable, locally available incentives focused on transportation electrification, or data related to electric transportation adoption occurring within SDCP’s service territory. SDCP is coordinating with its member municipalities to determine pertinent local targets for transportation and building electrification and, following the identification of these local planning parameters, will accordingly update its load curves to reflect such assumptions. To more closely align SDCP’s resource portfolio with the evolving energy requirements of its member communities, SDCP anticipates that a diverse set of renewable resources will be necessary, including the strategic inclusion of generating resources, energy storage resources, and complementary infrastructure that may allow SDCP to dispatch/shape such supply in consideration of evolving customer energy needs and usage patterns.~~

~~————~~ **IV.D. Lessons Learned – Assessment of RPS Portfolio Supplies and Demand**

SDCP continues to evaluate historical pricing trends, which have materially changed in the wake of increased renewable energy buildout, as well as supply chain backlogs.

Additionally, complexities and delays in the deliverability allocation process have put risk on project commercial operation dates and viability as energy-only projects. SDCP appreciates the substantial financial risks that are created by California’s long-term renewable contracting requirements and will continue to explore opportunities to manage such risks during its contracting efforts. SDCP also observes that technological diversity is an important principal to

²³ See Javanbakht, Heidi, Cary Garcia, Ingrid Neumann, Anitha Rednam, Stephanie Bailey, and Quentin Gee. 2022. Final 2021 Integrated Energy Policy Report, Volume IV: California Energy Demand Forecast. California Energy Commission. Publication Number: CEC-100-2021-001-V4, at 65.

incorporate in RPS planning efforts.

SDCP is also aware that prudent planning and successful management of CCA program finances is critical in managing ongoing market risk and other uncertainties. As such, SDCP will exercise care in pursuing its renewable energy supply options to promote alignment with budgetary parameters. SDCP may also pursue interagency solicitation/procurement opportunities to the extent that such coordinated efforts can increase procedural efficiency, reduce administrative redundancy, and decrease certain expenses typically associated with such processes.

As noted in previous planning documents, SDCP remains attentive to evolving market pricing conditions and will continue to evaluate historical pricing within geographic areas where renewable energy procurement opportunities are being considered, so long as the settlement structures associated with such procurement opportunities expose SDCP to market-based pricing risk. For now, SDCP has elected to pursue risk mitigation measures that are focused on: 1) the identification of highly qualified renewable energy suppliers – based on SDCP’s recently completed risk assessment and the assignment of risk ratings related to key risk factors, the identification of highly experienced RPS suppliers remains the most important consideration in ensuring that contracted RPS deliveries are fulfilled according to plan; 2) substantial levels of over-procurement created by SDCP’s initial renewable energy procurement target that commences at 50 percent and increases over time to 100% by 2035; and 3) the pursuit of contract structures that minimize the risk of delivery shortfalls by providing SDCP with fixed delivery quantities and/or financial protections that generally offset the impacts of financial penalties (prescribed under the RPS Program) in the event of non- or under-delivery.

V. Project Development Status Update

As described in Section IV.B above, SDCP's current and planned procurement is expected to be sufficient to meet both the applicable RPS procurement requirements as well as support the state's GHG reduction targets. Further, SDCP's current and planned procurement is expected to support system reliability by considering both portfolio diversity and alignment with SDCP's customers' load curve. SDCP has entered into ~~eleven~~ twelve agreements with RPS-eligible facilities, with ~~three~~ four having reached commercial operation. Additional SDCP has entered into five agreements with Investor-Owned Utilities that have online assets through ~~VAMOVAMO~~, or market offers. These agreements are summarized in the following table.

Facility Name	Technology Type	MW-ac	Location	Term Length	Expected COD	Network Upgrades Milestone	Development Phase
VAMO	Various	Portfolio	Various	10	On-line	Complete	Post-Construction
SDG&E ST (LT) MO	Various	Portfolio	Various	2	On-line	Complete	Post-Construction
SDG&E LT (LT) MO	Various	Portfolio	Various	16	On-line	Complete	Post-Construction
PG&E ST (LT) MO	Various	Portfolio	Various	2	On-line	Complete	Post-Construction
PG&E LT (LT) MO	Various	Portfolio	Various	20	On-line	Complete	Post-Construction
Duran Mesa	Wind	50	Torrance County, New Mexico	10	On-line	Complete	Post-Construction
Burney Forest Products	Biomass	29	Burney, CA	5	On-line	Complete	Post-Construction
IP Oberon	Solar	75	Riverside Riverside, CA	15	On-line	Complete	Post-Construction
Vikings Energy Farm	Solar + Storage	136.8	Imperial, CA	20	9/1/2024 On-Line	Complete	Post-Construction
Arrowleaf Solar and Storage	Solar + Storage	42	Imperial, CA	20			Construction

Yellow Pine III	Solar + Storage	35	Clark County, NV	20			Pre-Construction
JVR Energy Park	Solar + Storage	90	San Diego, CA	20			Pre-Construction
CDH Vidal LLC	Solar + Storage	160	San Bernadino, CA	20			Pre-Construction
SunZia PowerCo LLC	Wind	150	New Mexico	15			Pre-Construction
Pelican's Jaw Solar LLC	Solar + Storage	440	Kern County	15			Pre-Construction
Noble Solar LLC	Solar + Storage	400	Clark County, NV	20			Pre-Construction
Luminia Distributed Energy Projects	Solar + Storage	5.49	San Diego, CA	20			Pre-Construction
Luminia Distributed Energy Projects	Solar + Storage	5.49	San Diego, CA	20			Pre-Construction

~~Eight~~ [Seven](#) of SDCP's ~~eleven~~ [twelve](#) long-term RPS contracts are associated with generating resources that have yet to achieve commercial operation. These projects include:

- JVR Energy Park, LLC: a new 90 megawatt photovoltaic solar array (plus battery storage) located in San Diego County that is expected to commence commercial operation in Q4 2026.
- ~~Vikings Energy Farm: a new 136.8 megawatt photovoltaic solar array (plus 145.5 MW battery storage) located in Clark County, Nevada~~ [Imperial County, CA](#) ~~that is expected to commence commercial operation in Q3 2024~~ [came online in 2024](#).
- Arrowleaf Solar and Storage (Orni 30 LLC): a new 42 megawatt photovoltaic solar array

(plus 35 MW battery storage) located in Imperial County that is expected to commence commercial operation in Q~~4~~² 2025.

- Yellow Pine Solar III, LLC: a new 35 megawatt photovoltaic solar array (plus 35 MW battery storage) located in Clark County, Nevada that is expected to commence commercial operation in Q~~2~~⁴ 202~~7~~⁵.
- CDH Vidal LLC: a new 160 megawatt photovoltaic solar array (plus 160 MW battery storage) located in San Bernadino County that is expected to commence commercial operation Q~~4~~² 2026.
- Sunzia Wind PowerCo, LLC: a new 150 megawatt renewable wind energy generation, located in New Mexico [that is expected to commence commercial operations in Q2 2026;](#)
- Pelican’s Jaw Solar LLC: a new 440 megawatt photovoltaic solar array (plus 238.5 MW battery storage) located in Kern County that is expected to commence commercial operation in Q~~3~~²-202~~6~~⁷.
- [Noble Solar LLC: a new 400 megawatt photovoltaic solar array \(plus 400 MW battery storage\) located in Clark County, Nevada that is expected to commence commercial operation in Q2 202~~8~~⁷.](#)
- [Luminia Projects: a group of small distributed solar and storage projects totaling 5.49 MW of solar \(plus 20.57 MW battery storage\) located in San Diego, California that are expected to commence commercial operation in 2027.](#)

In consideration of SDCP’s recent contracting efforts with new renewable generating resources, it has updated Appendix D, the Project Development Status Update Report. SDCP is aware of the pandemic, geopolitical, supply-chain, and deliverability impacts that many LSEs and developers are currently facing related to new resource development and is working closely

with each of its contractual counterparties to monitor and mitigate any potential impacts of these delays on SDCP's supply portfolio, market exposure, RPS compliance, and customer rates. As new information related to SDCP's renewable energy contracting process(es) becomes available, SDCP will update its Project Development Status Update Report accordingly.

VI. Potential Compliance Delays

Based on recently completed and expected renewable energy procurement efforts and the acceptance of VAMO allocations, SDCP does not anticipate any compliance delays related to Compliance Period 4, which includes calendar years 2021-2024. If a future compliance issue is identified or SDCP encounters challenges in securing requisite renewable energy supply in the future, then SDCP will address such issue within a subsequent RPS Procurement Plan.

SDCP will continue assessing projected long-term open positions (that may exist in CP5 and CP6) relative to expected deliveries and intends to administer future solicitations, as necessary, to ensure compliance with the RPS Program over the upcoming 10-year planning horizon. If a future compliance issue is identified or SDCP encounters challenges in securing requisite renewable energy supply, then it will address such issues in a subsequent RPS Procurement Plan.

VII. Risk Assessment

VII.A. Compliance Risk

An important element of SDCP's RPS risk assessment process is determining potential vulnerabilities related to procurement and/or delivery shortfalls that could trigger deficits relative to SDCP's anticipated compliance obligations. Considering SDCP's internally adopted renewable energy procurement targets and existing contractual commitments, this risk, as internally determined by SDCP, appears to be very low in Compliance Period 4 and beyond. As discussed elsewhere in this planning document, SDCP has established a VMoP, which exceeds its MMoP, informs RPS procurement efforts, and insures against compliance-related shortfalls. More specifically, SDCP received a letter from the CPUC's Deputy Executive Director for Energy and Climate Policy on December 9, 2022, which provided an assessment of the perceived RPS compliance risk for Compliance Period 4 (calendar years 2021 through 2024). SDCP's risk level was categorized as low within this assessment letter, which was based on information included in SDCP's 2021 RPS Compliance Reports, as submitted in the summer of 2022.

SDCP understands that it ~~was~~ is not at risk of failing to meet its Compliance Period 2021-2024 RPS long-term procurement and RPS procurement quantity ~~requirements~~ ~~and requirements and~~ anticipates that it will not be at risk for future compliance periods either. SDCP believes that its internally adopted renewable energy procurement targets (reflective of its VmoP and MMoP), which meaningfully exceed RPS mandates, as well as existing contractual commitments, leave SDCP very well positioned to meet its ongoing RPS compliance obligations. If anything happens to change in terms of SDCP's internal assessment of RPS compliance risk, it will inform the CPUC accordingly in a future RPS Procurement

Plan.

|

VII.B. Risk Modeling and Risk Factors

SDCP makes reasonable efforts to minimize the risk of renewable procurement shortfalls for purposes of complying with applicable RPS mandates established in SB 100, but it cannot definitively predict the scope or magnitude of circumstances that may impact annual retail energy sales, renewable energy markets, or individual project performance. With this in mind, SDCP responsibly assesses RPS compliance risk by considering three key planning elements: 1) retail sales variability; 2) renewable energy production variability; and 3) impacts to overall system reliability associated with SDCP's planned RPS purchases and other influences. These topics are generally considered in the noted sequence with observed risks informing potential adaptations to SDCP's planning process, potential adaptations to planning reserves and, ultimately, refinements to SDCP's renewable energy procurement (or sales) processes and quantities. [SDCP utilizes advanced quantitative analytic software and tools to calculate at-risk metrics for both volumes and gross margin on a project and portfolio level. This helps SDCP develop a risk management policy and determine which risk factors are critical for RPS targets.](#)

As described elsewhere in this RPS Procurement Plan, SDCP's previously executed renewable supply contracts, current negotiating efforts, and ongoing procurement processes will place the organization in a strong position to meet applicable RPS compliance requirements in Compliance Period 4 and beyond. Therefore, SDCP's self-determined risk of non-compliance is low. Nevertheless, SDCP continues to assess demand-side and supply-side risks to better understand potential areas of concern and to promote achievement of organizational compliance objectives.

Regarding demand-side risk, SDCP continues to evaluate and update prospective retail sales related to its evolving customer base and trailing 10-year planning period, including but not

limited to anticipated changes related to customer eligibility, new development projects (that could increase retail energy consumption), business closures, expected customer attrition (or growth) and changes to behind-the-meter generating capacity. From a practical perspective, the greatest demand-side risk with regard to SDCP's anticipated customer base is that retail sales are meaningfully higher than anticipated during Compliance Period [54](#). As the Commission is aware, CCAs provide an opportunity for customer choice, allowing customers to voluntarily participate in SDCP's program or remain bundled customers of the incumbent utility, SDG&E. To the extent that customers choose to leave SDCP's CCA program, SDCP's retail sales will decrease, resulting in related increases to the ratio of renewable energy serving such customers (and improving SDCP's position relative to applicable RPS compliance mandates). It is unlikely that SDCP's renewable supply commitments will provide volumetric flexibility in the event of higher-than-anticipated retail sales volumes; in such instances, SDCP would need to pursue additional procurement opportunities to address unanticipated open positions. Because SDCP's anticipated participation rates are based on the well-documented experience of California's other operational CCA programs, [and SDCP's own experience](#), the organization is confident that actual retail sales will be reasonably well aligned with related forecasts.

Considering SDCP's ongoing coordination with member municipalities and associated planning departments, SDCP expects to be well informed regarding upcoming development projects or other customer changes that could materially increase retail sales. For this reason, SDCP believes that demand-side RPS compliance risk is low.

Regarding supply-side risks, SDCP is aware of the generation variability and intermittency associated with certain renewable technologies as well as the possibility of curtailment (based on pricing considerations or market directives), especially during certain

seasons and times of day. In the case of new-build renewable projects, SDCP is also aware of the possibility of project delays and, potentially, project failure. Such circumstances can materially diminish renewable energy deliveries, jeopardizing the achievement of RPS compliance and exposing the organization to unexpected financial consequences. This noted, a primary objective of the SDCP's CCA program is offering participating customers stable and competitive retail generation rates, so the organization must balance generalized over-purchasing of certain compliance products, including RPS-eligible renewable energy, with related budgetary impacts. In its RPS planning process, SDCP has considered such impacts as well as previous procurement practices, which have satisfied applicable compliance mandates reflected in California's RPS program. Long-term RPS procurement typical lead times (between contract execution and project completion) associated with new-build renewable energy projects are often 2-3 years or longer. It is becoming more commonplace that contracting efforts are initiated further in advance of service commencement than historically has been the norm. With this observation in mind, SDCP must either: 1) focus RPS contracting efforts on existing renewable generating resources; or 2) accept failure and delay risks associated with new-build renewable projects placed under contract by incorporating reasonable planning reserves to mitigate such risks. SDCP's VAMO allocation elections, however, serve as a mitigating factor when considering long-term RPS compliance risk, as the typical lead time associated with new-build renewable generating projects does not apply to these deliveries, which began in 2022. In the case of SDCP, a balanced approach has been pursued, which has entailed contracting efforts focused on both existing and new renewable generating resources, thereby minimizing, but not eliminating, risks associated with compliance shortfalls. With SDCP's expansion in 2023, resource planning and procurement efforts were focused on addressing known increases in the

organization's RPS needs, particularly long-term RPS needs. Prior to its expansion activities, SDCP expected to have a long-term RPS surplus in CP4. SDCP elected to receive 100 percent of available long-term VAMO allocations, and MO awards, to help satisfy this compliance mandate. [With no planned expansions in CP5, SDCP can focus more of its procurement efforts on new renewable generation resources.](#) Regardless of the eventual long-term contracting opportunities that may be pursued by SDCP, the organization intends to pursue contract volumes in sufficient quantity to accommodate one or more project failures amongst SDCP's currently executed contracts and upcoming contract opportunities. SDCP has evaluated volumetric risk (due to project delays and under performance) in its updated risk assessment, as further described below, and has accounted for such impacts within Appendix C.

SDCP also anticipates mitigating supply-side risk by incorporating fixed-volume and index-plus pricing structures amongst its portfolio of RPS supply agreements. These procurement mechanisms serve to mitigate the risk of delivery variability (typically associated with intermittent renewable resources and renewable resources that may be subject to periodic curtailment) and exposure to negative market pricing (which could prompt economic curtailment). Fixed volume arrangements, in particular, also mitigate risk associated with commercial operation delays and facility failure; these structures also provide buyers with financial protections (via penalty payments) for under-delivery (which could be used, as a last resort, to offset compliance penalties in the event that the supplier or SDCP are unable to identify replacement volumes).

As part of SDCP's approach to managing supply-side risk, it has also adopted what it believes to be a CCA best practice related to RPS contracting: structuring solicitations to identify proven renewable generating technologies in prime resource locations to be developed and/or

operated by the most experienced available suppliers (with strong, well-documented track records of successful project completion and operational reliability). When evaluating prospective renewable energy supply opportunities, SDCP will seek to minimize the risk of delivery failure (or shortfalls) by pursuing supply arrangements with such experienced and financially stable suppliers that have demonstrated successful track records. This noted, there is always a possibility that future renewable energy supply will not be delivered as required, which is why SDCP intends to periodically evaluate the sufficiency of currently anticipated renewable energy procurement targets in meeting both statutory mandates and prudent planning reserve levels. Given SDCP's initial commitment to an overall portfolio with a minimum 50 percent renewable content, it seems highly unlikely that cumulative renewable energy delivery shortfalls could result in compliance deficiencies in the near term. While other CCA programs may choose to pursue differing planning reserve targets, SDCP observes that there does not seem to be a clear standard or related guidelines for setting such metrics and believes that its anticipated, internally defined renewable energy targets provide sufficient planning reserves.

Following contract execution, SDCP staff closely coordinate with its suppliers, particularly developers of any new-build resource, to maintain an acute awareness of project development progress, including any anticipated issues that could delay expected initial deliveries or compromise overall project viability. Such communications are intended to provide SDCP with an early indication of such issues, which would allow corrective procurement actions to occur if the extent of such issues were determined to impact SDCP's RPS compliance status.

In terms of system and resource reliability, SDCP has adopted a procurement approach that intends to emphasize resource and contractual diversity. This process is expected to contribute to the identification of renewable generating resources that should positively impact

system reliability over time.

SDCP will consider this potential risk of generation variability during its resource planning process and related contracting efforts and may pursue contract structures that promote volumetric stability through the application of firm delivery quantities or performance guarantees that provide financial remedies/penalties in the event of delivery shortfalls. If necessary, the application of such penalties could be used: 1) as a first priority, to procure additional renewable energy supply to address delivery shortfalls; or 2) in the event of a determination of non-compliance, to offset the cost of related penalties. SDCP's intent is to achieve and maintain compliance with applicable RPS mandates, and the latter option is a last resort that is not expected to apply.

In addition to the previously described considerations, SDCP utilizes a quantitative risk assessment that quantifies the energy impacts related to supply side losses. This approach organizes prospective risks into three general categories which pose the greatest supply-side impacts to the delivery of expected RPS energy: 1) curtailment risk; 2) counterparty risk; and 3) project failure risk.

As part of its quantitative risk assessment, SDCP examines hourly forward-looking data that could lead to curtailment risk, specifically the likelihood that an hour within the forward market exhibits negative pricing through the expiration of each contract. Below a certain negative dollar amount, SDCP is presumed to be better off financially if it were to curtail the affected generating unit and, as a substitute for such curtailment, purchase additional renewable energy credits on the open market. Considering SDCP's current long-term renewable energy positions, a reduction in long-term RPS volumes due to curtailment could, potentially, compromise the prospect of RPS compliance. The figures presented in the column quantifying

curtailment risk are calculated by quantifying the volume of expected energy deliveries and multiplying such volume by the likelihood of curtailment. *Based on SDCP's assessment of curtailment risk associated with its renewable energy contract portfolio, this risk category was assigned a rating of low.*

Counterparty risk is the risk posed by a counterparty being unable or unwilling to honor its total RPS delivery obligations, as reflected in related contract documents. SDCP has quantified this likelihood by considering S&P Global's, Global Corporate Annual Default Rates by Rating Category (%) as a measure of organizational viability and financial stability. While this rate considers industries beyond the energy sector, it provides relevant insights into the correlation and potential impacts of dealing with uncreditworthy counterparties. The likelihood of default by credit rating was averaged over the years from 201~~8~~⁴ to 202~~4~~¹⁹. These years 2020 and 2021 were ~~chosen to remove~~excluded to remove irregularities in default rates during the Covid-19 pandemic. If a counterparty was found to be unrated, then the contract was reviewed to identify specified credit assurances; based on such assurances, an approximate rating was derived based on SDCP's experience and risk tolerance. *Based on SDCP's assessment of counterparty risk associated with its renewable energy contract portfolio, this risk category was assigned a rating of low.*

The final category reflected in SDCP's analysis is project failure risk. This category is distinct from counterparty risk because the risk of project failure may only affect a single project under a counterparty's portfolio. Projects may be cancelled for a variety of reasons. This risk only affects single source projects which have yet to be constructed. These projects were chosen because they have a single point of failure unlike RPS energy purchased from a pool of resources. Based on discussions with various counterparties, other load serving entities and its

own experience, SDCP has assessed that this risk effects roughly 1 in 20 deals. *Based on SDCP's assessment of project failure risk associated with its renewable energy contract portfolio, this risk category was assigned a rating of low.*

Considering these categories holistically, SDCP was able to derive a cumulative energy percentage at risk. In consideration of SDCP's relatively conservative risk tolerances, a top-level risk of non-delivery offset at 0.25% of renewable energy procurements was added to the calculated energy at risk percentage. This adder will help to account for risks that SDCP cannot foresee and will help to guarantee the sufficiency of SDCP's planned RPS purchases in meeting both compliance-related and internally adopted renewable energy procurement targets. The percentage of renewable energy is the percentage of total renewable energy procured that was determined to be at risk, while the percentage of retail load is the energy at risk as a percentage of retail load. These "at risk" percentages reflect possible losses which, through no fault of SDCP, may occur by virtue of being a market participant. These losses pose a risk for non-compliance relative to SDCP's RPS goals and targets. Since this number is not a guaranteed loss, SDCP will implement the previously mentioned mitigation strategies to give the greatest chance of meeting its adopted renewable energy procurement targets.

ID	Contract		Energy to be Delivered to Market (MWh)	Curtailement Risk (MWh)	Counterparty Risk (MWh)	Project Cancellation Risk (MWh)
1	Contract 2821		6,638,597	29,874	127,461	-
2	Contract 2964		3,116,004	14,022	59,827	-
3	Contract 3555		24,191,082	108,860	7,257	-
4	Contract 3590		1,298,097	5,841	24,923	-
5	Contract 3973		262,502	-	78,7506	-
6	Contract 4306		5,549,911	24,975	106,558	2,775
7	Contract 4424		686,628	-	206	-
8	Contract 4644		3,310,192	-	993	-
9	Contract 4968		2,954,722	-	886	-
10	Contract 5000		2,223,014	10,004	42,682	1,111.51
11	Contract 5007		39,468	-	12	-
12	Contract 5008		616,737	-	185	-
13	Contract 5009		1,895,864	8,531	36,401	948
14	Contract 5402		9,222,625	41,502	177,074	4,611
15	Contract 5406		7,108,675	31,989	136,487	-
16	Contract 5455		18,126,151	81,568	348,022	9,063
17	Contract 5489		22,875,671	102,941	439,213	22,875.67
18	Contract 5603		4,390	-	1	-
19	Contract 5606		153,225	-	46	-
20	Contract 5607		1,591,005	-	477	-
21	Contract 5612		4,686,845	-	1,406	-
Total			116,551,405	460,106	1,510,198	41,384

Energy

Total Renewable Energy	116,551,405
Total Renewable Energy at Risk	2,011,688
% of Renewable Energy at Risk	1.73%
% of Unknown Error at Risk	0.25%
% of Renewable Energy & Error at Risk	1.98%
% of Retail Load	0.96%

ID	Contract		Energy to be Delivered to Market (MWh)	Curtailement Risk (MWh)	Counterparty Risk (MWh)	Project Cancellation Risk (MWh)
1	Contract 2821		6,638,597	15,933	127,461	3,319
2	Contract 2964		3,116,004	7,478	59,827	1,558.00
3	Contract 3555		24,191,082	58,059	464,469	12,096
4	Contract 3590		1,298,097	3,115	24,923	649.05
5	Contract 3838		73,439		22	-
6	Contract 3973		262,502		79	-
7	Contract 4306		5,549,911	13,320	106,558	2,775
8	Contract 4424		686,628		206	-
9	Contract 4644		3,310,192		993	-
10	Contract 4967		284,556		85	-
11	Contract 4968		2,954,722		886	-
12	Contract 5000		2,223,014	5,335	42,682	1,111.51
13	Contract 5007		39,468		12	-
14	Contract 5008		616,737		185	-
15	Contract 5009		1,895,864	4,550	36,401	948
16	Contract 5012		50,002		15	
17	Contract 5402		9,222,625	22,134	177,074	4,611
18	Contract 5406		7,108,675	17,061	136,487	3,554.34
19	Contract 5455		18,126,151	43,503	348,022	9,063
20	Contract 5489		22,875,671	54,902	439,213	11,437.84
21	Contract 5509		146,250		44	
22	Contract 5602		4,390		1	
23	Contract 5606		153,225		46	
24	Contract 5607		1,591,005		477	
25	Contract 5612		4,686,845		1,406	
Total			117,105,652	245,390	1,967,575	51,123

Energy

Total Renewable Energy	117,105,652
Total Renewable Energy at Risk	2,264,088
% of Renewable Energy at Risk	1.93%
% of Unknown Error at Risk	0.25%
% of Renewable Energy & Error at Risk	2.18%
% of Retail Load	1.08%

Based on SDCP's analysis, SDCP determined that ~~1.731.93~~ percent of SDCP's expected future RPS deliveries may be at risk, which equates to ~~01.96~~1.08 percent of SDCP's retail load. These percentages reflect average risk throughout the study period, which suggests that actual risk could fall somewhat above or below these percentages. Regardless, the potential risk-related impacts to SDCP's RPS supply portfolio fall well below VMoP and MMoP reflected in its RPS planning process. *In consideration of the results of SDCP's risk analysis, the composite risk*

assessment, which considers all three of the previously described risk categories, results in an overall risk rating of low.

As previously noted, SDCP adopted an ERM Policy at the meeting of its governing board on June 25, 2020. In accordance with SDCP's ERM Policy, these risk analyses are shared and reviewed with SDCP's ROC. If SDCP's internally adopted planning targets and related procurement efforts prove to be insufficient in meeting near-term RPS compliance targets, SDCP will bring such findings to the attention of its ROC and pursue suitable resolutions and mitigation measures under the oversight of the committee.

SDCP is actively monitoring milestone completion for new-build renewable projects that have yet to achieve commercial operation with the goal of promoting timely project completion and initial deliveries to ensure that SDCP meets applicable compliance mandates during CP54 and beyond. To the extent that SDCP observes issues related to key milestone completion, it will accordingly adjust anticipated renewable energy deliveries to account for the prospect of RPS shortfalls (even though such shortfalls are unlikely to present compliance issues, due to the relatively high renewable energy content reflected in SDCP's default retail service offering).

~~VII.C. System Reliability~~

~~With respect to system reliability, SDCP is aware of the need to pursue a portfolio of renewable resources with diverse and complementary delivery profiles as well as complimentary infrastructure (namely, energy storage infrastructure) that will support the reshaping of renewable energy deliveries to better align with load. For example, renewable energy procurement efforts that may initially focus on relatively low-cost solar resources will often necessitate subsequent investments in co-located energy storage infrastructure or higher-cost baseload renewable generating technologies, such as those using geothermal, biomass and~~

landfill gas fuel sources. These baseload renewable technologies are often priced at three to four times the level of in-state photovoltaic solar generation but generally provide increased capacity value (due to the more predictable, baseload generating profiles of such resources) and related reliability enhancements. To date, in pursuit of a balanced portfolio that ensures reliable renewable energy supply, SDCP has contracted with seven solar resources which are hybridized or co-located with battery storage, two wind generating facilities which have generation profiles that are complementary to the solar and in-state wind generation shapes, and is actively negotiating with or soliciting offers for additional hybrid renewable resources, stand-alone storage facilities, and “clean firm” renewable resources. Going forward, SDCP will continue to balance these competing portfolio management interests to support reasonably close alignment between supply and demand (reducing the need for pronounced resource ramping on the system), cost-effective procurement and overall grid reliability. SDCP is aware that low-cost, long-term solutions are challenging to identify at this time, but it will remain committed to pursuing a conscientious planning process that balances grid reliability, compliance demonstration and customer cost impacts. SDCP is willing to engage in discussions with SDG&E and the California Independent System Operator regarding reliability and other system impacts related to its portfolio. SDCP is further willing to consider the feedback provided by the organizations in its planning and procurement processes going forward, so long as such suggestions generally conform with organizational objectives and Board-adopted policies. *In consideration of SDCP’s diverse contractual commitments for requisite renewable energy supply and ongoing focus on the identification of RPS-eligible and complementary technologies that will mitigate reliability impacts associated with increased use of intermittent generating resources throughout the state, overall risks to system reliability associated with SDCP’s RPS Procurement Plan were*

~~*determined to be low.*~~

VII.~~CD~~. Lessons Learned – Risk Assessment

In terms of lessons learned related to risk management, SDCP observes that internally adopted, above-RPS planning targets generally serve as effective mitigation measures related to RPS compliance. This approach seems to be supported by SDCP's low risk categorization from the compliance risk assessment letter from the CPUC, especially given SDCP has since meaningfully increased its RPS procurement via acceptance of its VAMO allocations. SDCP will, however, continue to evaluate the sufficiency of its adopted planning reserves (VMoP and MMoP) to reduce the risk of RPS compliance shortfalls. If future RPS contracting activities impose larger than anticipated risks (on project failure or under-delivery), SDCP may increase its planning reserved to provide additional protection against such risks. The extent to which such adjustments may occur is not known at this time but will be discussed, as necessary, in a future RPS Procurement Plan.

SDCP has also observed the value of resource diversity across a broad spectrum of considerations, including resource location, generating technology, suppliers/developers and contract structures, amongst other concerns. Long-term renewable supply commitments are inherently risky in the sense that such commitments expose the buyer and seller to a variety of unknown circumstances, including but not limited to evolving market prices and policy changes. Throughout a long-term contract relationship, it seems evident that areas with initially low levels of negative pricing (and related curtailment of energy production) can materially change as new project development activity occurs, creating (or exacerbating) conditions of over-supply and related incidents of energy curtailment. This risk is particularly challenging to manage, as California's escalating RPS procurement mandates necessitate ongoing investment in new renewable generating infrastructure, which is often sited in resource-rich areas that become

saturated with similar generating technologies (and related delivery profiles). These circumstances seem inevitable and, over the course of a long-term supply relationship, may expose the contracted parties to unexpected risks, including negative prices (and related budgetary impacts) and curtailed deliveries (which may compromise the fulfillment of mandated procurement targets by the buyer). Again, SDCP will periodically reevaluate its current renewable energy planning reserve to address anticipated curtailment and/or underperformance risk to the extent that such concerns are pertinent to SDCP's renewable contract portfolio.

SDCP is also aware that risk can be diversified through various contract structures. For example, an "index-plus" pricing structure is useful in transferring market price risk to the seller – in such structures, the buyer pays a fixed renewable premium, while the seller assumes risk associated with market price fluctuations but also receives market revenues (which could be higher or lower than anticipated) – even though the buyer receives the energy, renewable attribute, and (in certain instances) capacity value as part of such a transaction, the buyer's financial risk is generally limited to the payment of the renewable premium. For buyers who are averse to market price risk, the index-plus pricing structure effectively eliminates this concern but may result in higher overall contract costs (which may be acceptable, as a form of insurance, to mitigate market price exposure). In other structures, such as the "fixed-price" structure, the renewable energy premium and energy commodity (and oftentimes, capacity value) are reflected in a single price paid by the buyer – this structure deliberately allocates market price risk to the buyer, but the buyer may also pay a lower imputed renewable premium in instances where market revenues (realized when the energy commodity is delivered to the grid) closely approximates (or exceeds) the aggregate renewable energy price. SDCP has pursued both pricing structures as part of its portfolio diversification and risk management strategies,

attempting to balance risk across a broad range of considerations. Any changes to this approach will be articulated in future iterations of the RPS procurement planning process.

VIII. Renewable Net Short Calculations

SDCP has provided a quantitative assessment to support the qualitative descriptions provided in this RPS Procurement Plan, which is attached as Appendix C. At this time and based on SDCP's initial renewable energy contracting efforts, certain risk-related adjustments have been incorporated in Appendix C, as described above. More specifically, SDCP previously described (above, in Section VII, Risk Assessment) its quantitative risk assessment methodology and the results of such analysis, which suggested that 1.~~7335%~~35% of future renewable energy deliveries were at risk, meaning that SDCP reasonably anticipates that this portion of expected renewable energy deliveries will not be received. This determination was based on an assessment of the risk categories reflected in SDCP's analysis, which included: 1) curtailment risk; 2) counterparty risk; and 3) project failure risk. In an effort to impute further conservatism in its risk management process (to mitigate against the prospect of compliance shortfalls), SDCP increased the 1.~~7335%~~ figure derived through its risk assessment to a full 2.00% delivery failure rate when preparing its Renewable Net Short calculations; this figure can be ~~seen~~ in rows 14 and 16 of the RNS reporting template. Such an (upward) adjustment was deemed appropriate to insure against unexpected renewable energy delivery shortfalls that could not be reasonably quantified through the aforementioned assessment. Also note that SDCP increased its forecasted failure rate for RPS Facilities in Development to 27% in 2023, an adjustment that was intended to reflect potential operational delays and resultant delivery shortfalls. This adjustment still seems sufficient in ~~2024~~2025. If such adjustments are deemed insufficient in the future, based on regular project development status updates, the results of a future SDCP risk assessment, or other information, SDCP will update such adjustments in a future planning document based on

information specifically related to each contracting opportunity subsumed in Appendix C.

Due to SDCP's successful procurement efforts to date, it is now accruing renewable energy quantities in excess of applicable statewide mandates. Renewable suppliers have generally performed as expected, so the noted failure rates that are reflected in ~~Appendix~~~~Exhibit~~ C (set at two percent in future years) are in excess of the findings reflected in SDCP's previously described risk assessment, which ~~indicated~~indicate that 1.~~7335~~ percent of such supply may be at risk. If supplier performance becomes more erratic in the future and adjustments to these assumptions are deemed necessary, SDCP will reflect such adjustments in a future planning document.

IX. Minimum Margin of Procurement (MMoP)

IX.A MMoP Level

SDCP is developing an electricity supply portfolio that will further the achievement of state mandates as well as internally adopted goals for increasing RPS-eligible renewable energy supply over time. The following table displays SDCP's intended margin of RPS over-procurement based on the differential between the SB 100 procurement targets and SDCP's internally adopted RPS procurement targets. ~~These~~is ~~table~~s ~~reflects~~ SDCP's voluntary margin of over-procurement, or VMoP.

State & Internally Adopted Renewable Energy Requirements

~~2023-2029~~

	202 <u>3</u>	202 <u>4</u>	202 <u>5</u>	202 <u>6</u>	202 <u>7</u>	202 <u>8</u>	202 <u>9</u>	203 <u>0</u>	203 <u>1</u>	203 <u>2</u>	203 <u>3</u>	203 <u>4</u>	203 <u>5</u>
SB-100 RPS Procurement t Requirement t (% of	41.3 <u>44</u>	44 <u>46.7</u>	46.7 <u>49.3</u>	49.3 <u>52</u>	52 <u>54.7</u>	54.7 <u>57.3</u>	57.3 <u>60</u>	60 <u>60</u>	60 <u>60</u>	60 <u>60</u>	60 <u>60</u>	60 <u>60</u>	60 <u>60</u>

<u>Retail Sales)</u>													
<u>SDCP's</u> <u>Minimum</u> <u>Internally</u> <u>Adopted</u> <u>RPS</u> <u>Procurement</u> <u>Target</u>	<u>58.3</u>	<u>52</u>	<u>54</u>	<u>58</u>	<u>70</u>	<u>78.3</u>	<u>81.7</u>	<u>85</u>	<u>88</u>	<u>91</u>	<u>94</u>	<u>97</u>	<u>100</u>
<u>SDCPs</u> <u>Voluntary</u> <u>Margin</u> <u>Over</u> <u>Procurement</u> <u>Target (% of</u> <u>Retail Sales)</u>	<u>17</u>	<u>8</u>	<u>7.3</u>	<u>8.7</u>	<u>18</u>	<u>23.6</u>	<u>24.4</u>	<u>25</u>	<u>28</u>	<u>31</u>	<u>34</u>	<u>37</u>	<u>40</u>

2023-2029

	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>
<u>SB 100 RPS Procurement Requirement</u> <u>(% of Retail Sales)</u>	<u>41.3</u>	<u>44</u>	<u>46.7</u>	<u>49.3</u>	<u>52</u>	<u>54.7</u>	<u>57.3</u>
<u>SDCP's Minimum Internally Adopted</u> <u>RPS Procurement Target</u>	<u>58.3</u>	<u>52</u>	<u>54</u>	<u>58</u>	<u>70</u>	<u>78.3</u>	<u>81.7</u>
<u>SDCPs Voluntary Margin Over</u> <u>Procurement (% of Retail Sales)</u>	<u>17</u>	<u>8</u>	<u>7.3</u>	<u>8.7</u>	<u>18</u>	<u>23.6</u>	<u>24.4</u>

2030-2035

	<u>2030</u>	<u>2031</u>	<u>2032</u>	<u>2033</u>	<u>2034</u>	<u>2035</u>
<u>SB 100 RPS Procurement Requirement</u> <u>(% of Retail Sales)</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>

<u>SDCP's Minimum Internally Adopted RPS Procurement Target</u>	<u>85</u>	<u>88</u>	<u>91</u>	<u>94</u>	<u>97</u>	<u>100</u>
<u>SDCPs Voluntary Margin Over-Procurement (% of Retail Sales)</u>	<u>25</u>	<u>28</u>	<u>31</u>	<u>34</u>	<u>37</u>	<u>40</u>

-	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
SB-100 RPS-Procurement Requirement (% of Retail Sales)	38.5	41.3	44	46.7	49.3	52	54.7	57.3	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS-Procurement Target	54.2	58.3	52	56.2	70.8	75	78.3	81.7	85	88	91	94	97
SDCPs Voluntary Margin Over-Procurement (% of Retail Sales)	15.7	17.0	8.0	9.5	21.5	23.0	23.6	24.4	25.0	28.0	31.0	34.0	37.0

~~2030-2035~~

	2030	2031	2032	2033	2034	2035
SB 100 RPS Procurement Requirement (% of Retail Sales)	60	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS Procurement Target	85	88	91	94	97	100
SDCPs Voluntary Margin Over Procurement (% of Retail Sales)	25	28	31	34	37	40

As reflected in the previous ~~tables~~[tables](#), SDCP's RPS-eligible renewable energy target was set at a minimum 50 percent in 2021, increasing to ~~75~~[70](#) percent by 2027 and to 100 percent by 2035. ~~SDCP's internally adopted renewable energy procurement targets are intended to support SDCP's broader goal of providing a minimum 90% carbon-free electricity to all customers by 2030.~~ SDCP's internally adopted minimum renewable energy procurement goals ensure a significant margin of procurement above the SB 100 mandates. SDCP's internally adopted renewable energy procurement goals provide a meaningful buffer above the state's RPS requirements and serve as SDCP's VMoP – SDCP's VMoP will exceed statewide RPS mandates by at least 8 percent (relative to retail sales), increasing in each year through 2035.

To address RPS compliance risk, SDCP uses its risk assessments, including its renewable net short calculations, to consider a Minimum Margin of Procurement to guide RPS compliance procurement planning. SDCP previously calculated the minimum margin of procurement, or MMoP, using a 10% risk adjustment that was applied to SDCP's minimum

internally adopted RPS procurement target, which is reflective of the renewable content offered through SDCP’s default retail service offering, PowerOn. Given that the magnitude of VMoP associated with its PowerOn service offering significantly exceeds a potential MMoP, SDCP considers its MMoP to be subsumed within its VMoP. On a voluntary basis, beginning in 2024, SDCP customers may enroll in SDCP’s Power100 Green+, a 100% renewable energy service offering that is supplied from Green-E certified resources, SDCP’s 100% renewable energy service offering, Power100, or PowerBase, a renewable product offering affordability. Customer participation in either of the Power100 programs increases SDCP’s overall renewable energy need but also provides an enhanced procurement buffer relative to applicable compliance mandates. This noted, SDCP does not rely on additional renewable energy volumes required to serve Power100 customers in determining its MMoP or VMoP – such incremental renewable energy purchases are additive to SDCP’s MMoP and VMoP (meaning that such volumes are in excess of the additional renewable energy purchases required to meet SDCP’s MMoP and VMoP). For Power100 Green+ customers, only the minimum state RPS percentages may count towards RPS compliance, and are not additive to SDCP’s MMoP and VMoP. Based on the manner in which SDCP has established its MMoP, as a 10% planning risk adjustment relative to total renewable energy requirements, the effective MMoP percentages observed by SDCP are approximately 14%-15%, relative to SDCP’s projected RPS compliance need, for each year through ~~2034~~2035. The following ~~eharts~~charts provides additional detail regarding the effective MMoP percentages observed by SDCP.

~~2023-2029~~

	202 <u>202</u> 3 <u>3</u>	202 <u>202</u> 4 <u>4</u>	202 <u>202</u> 5 <u>5</u>	202 <u>202</u> 6 <u>6</u>	202 <u>202</u> 7 <u>7</u>	202 <u>202</u> 8 <u>8</u>	202 <u>202</u> 9 <u>9</u>	203 <u>203</u> 0 <u>0</u>	203 <u>203</u> 1 <u>1</u>	203 <u>203</u> 2 <u>2</u>	203 <u>203</u> 3 <u>3</u>	203 <u>203</u> 4 <u>4</u>	203 <u>203</u> 5 <u>5</u>
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<u>SB-100- RPS- Procurement- Requirement (% of Retail- Sales)</u>	<u>41.3</u>	<u>44</u>	<u>46.7</u>	<u>49.3</u>	<u>52</u>	<u>54.7</u>	<u>57.3</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>
<u>SDCP's Minimum- Internally- Adopted- RPS- Procurement Target</u>	<u>58.3</u>	<u>52</u>	<u>54</u>	<u>58</u>	<u>70</u>	<u>78.3</u>	<u>81.7</u>	<u>85</u>	<u>88</u>	<u>91</u>	<u>94</u>	<u>97</u>	<u>100</u>
<u>SDCP's RPS- Planning- Risk- Adjustment (at 10% of Minimum- Internally- Adopted- RPS- Target)</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>
<u>SDCP's Minimum- Margin of Over- Procurement (% of Retail- Sales)</u>	<u>5.8</u>	<u>5.2</u>	<u>5.4</u>	<u>5.8</u>	<u>7</u>	<u>7.8</u>	<u>8.2</u>	<u>8.5</u>	<u>8.8</u>	<u>9.1</u>	<u>9.4</u>	<u>9.7</u>	<u>10</u>
<u>SDCP's Minimum- Margin of Over- Procurement (%- buffer- relative to RPS- Mandate)</u>	<u>14.1</u>	<u>11.8</u>	<u>11.6</u>	<u>11.8</u>	<u>13.5</u>	<u>14.3</u>	<u>14.3</u>	<u>14.2</u>	<u>14.7</u>	<u>15.2</u>	<u>15.7</u>	<u>16.2</u>	<u>16.7</u>

2023-2029

	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>
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<u>SB 100 RPS Procurement Requirement (% of Retail Sales)</u>	<u>41.3</u>	<u>44</u>	<u>46.7</u>	<u>49.3</u>	<u>52</u>	<u>54.7</u>	<u>57.3</u>
<u>SDCP's Minimum Internally Adopted RPS Procurement Target</u>	<u>58.3</u>	<u>52</u>	<u>54</u>	<u>58</u>	<u>70</u>	<u>78.3</u>	<u>81.7</u>
<u>SDCP's RPS Planning Risk Adjustment (at 10% of Minimum Internally Adopted RPS Target)</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>
<u>SDCP's Minimum Margin of Over- Procurement (% of Retail Sales)</u>	<u>5.8</u>	<u>5.2</u>	<u>5.4</u>	<u>5.8</u>	<u>7</u>	<u>7.8</u>	<u>8.2</u>
<u>SDCP's Minimum Margin of Over- Procurement (% buffer relative to RPS Mandate)</u>	<u>14.1</u>	<u>11.8</u>	<u>11.6</u>	<u>11.8</u>	<u>13.5</u>	<u>14.3</u>	<u>14.3</u>

2030-2035

	<u>2030</u>	<u>2031</u>	<u>2032</u>	<u>2033</u>	<u>2034</u>	<u>2035</u>
<u>SB 100 RPS Procurement Requirement (% of Retail Sales)</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>
<u>SDCP's Minimum Internally Adopted RPS Procurement Target</u>	<u>85</u>	<u>88</u>	<u>91</u>	<u>94</u>	<u>97</u>	<u>100</u>
<u>SDCP's RPS Planning Risk Adjustment (at 10% of Minimum Internally Adopted RPS Target)</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>
<u>SDCP's Minimum Margin of Over-Procurement (% of Retail Sales)</u>	<u>8.5</u>	<u>8.8</u>	<u>9.1</u>	<u>9.4</u>	<u>9.7</u>	<u>10</u>
<u>SDCP's Minimum Margin of Over-Procurement (% buffer relative to RPS Mandate)</u>	<u>14.2</u>	<u>14.7</u>	<u>15.2</u>	<u>15.7</u>	<u>16.2</u>	<u>16.7</u>

-	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
SB-100-RPS-Procurement Requirement (% of Retail Sales)	38.5	41.3	44	46.7	49.3	52	54.7	57.3	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS Procurement Target	54.2	58.3	52.0	56.2	70.8	75.0	78.3	81.7	85.0	88.0	91.0	94.0	97

SDCP's RPS-Planning-Risk-Adjustment (at 10% of Minimum Internally-Adopted RPS-Target)	10	10	10	10	10	10	10	10	10	10	10	10	10	10.0
SDCP's Minimum-Margin-of-Over-Procurement (% of Retail-Sales)	5.4	5.8	5.2	5.6	7.1	7.5	7.8	8.2	8.5	8.8	9.1	9.4	9.7	
SDCP's Minimum-Margin-of-Over-Procurement (%-buffer-relative-to-RPS-Mandate)	14.1	14.1	11.8	12.0	14.4	14.4	14.3	14.3	14.2	14.7	15.2	15.7	16.2	

2030-2035

	2030	2031	2032	2033	2034	2035
SB-100 RPS-Procurement-Requirement (% of Retail Sales)	60	60	60	60	60	60
SDCP's Minimum-Internally-Adopted-RPS-Procurement-Target	85	88	91	94	97	100

SDCP's RPS Planning Risk Adjustment (at 10% of Minimum Internally Adopted RPS Target)	10	10	10	10	10	10
SDCP's Minimum Margin of Over-Procurement (% of Retail Sales)	8.5	8.8	9.1	9.4	9.7	10
SDCP's Minimum Margin of Over-Procurement (% buffer relative to RPS Mandate)	14.2	14.7	15.2	15.7	16.2	16.7

SDCP's MMoP is intended to address potential delivery variability for intermittent resources, curtailment risk, project delays (or failures) and other operational peculiarities that may cause actual renewable energy deliveries to deviate from projections. Note that certain SDCP renewable energy deliveries are not subject to variability – such agreements reflect minimum fixed delivery quantities (or quantities with limited volumetric variability) with corresponding financial penalties (paid to SDCP by related sellers in the event of delivery shortfalls). SDCP has limited exposure to resource intermittency via its long-term renewable supply agreement with Duran Mesa, LLC, Vikings Energy Farm LLC, and IP Oberon LLC. Other sources of exposure will occur as other contracts come online in ~~2024~~[2025](#) and beyond and have been accounted for in SDCP's previously described risk assessment.

If SDCP adopts changes to its future renewable energy content and service offerings, future RPS procurement planning documents will be updated accordingly. Staff assumes that future renewable procurement targets (inclusive of planning reserves necessary to meet RPS mandates) will consider a variety of factors, including but not limited to: the operational status of prospective renewable energy facilities to be placed under contract; the experience and general

development track record of each project development team (associated with new resources); resource size (capacity); the location of prospective generating resources (for new facilities); and, impacts of over-procurement to the CCA program's procurement budget and customer rates – certain of these factors are appropriately considered in SDCP's quantitative risk assessment.

IX.A.1 MMoP Methodology and Inputs

SDCP's MMoP is intended to address an RPS failure rate at or above that which is reflected in the renewable net short reporting template. In the event of contract under-deliveries, commercial operation delays or project failures, the MMoP should be sufficient to ensure SDCP is compliant with the RPS procurement requirements. SDCP's VMoP, which includes its MMoP, is the annual RPS-eligible minimum portfolio content identified in SDCP's internally adopted planning targets.

As discussed in Section VIII, SDCP has incorporated risk adjustments to certain renewable energy delivery estimates associated with existing generating facilities (due to increased fire risk throughout the state of California and the potential for related delivery reductions; delivery intermittency is also subsumed in prescribed risk adjustments) and resources that are under development. Achieving SDCP's VMoP necessitates higher levels of renewable energy procurement for each year through ~~2034~~2035), which accommodate the potential for delivery shortfalls (due to a variety of circumstances) while still allowing SDCP to meet prescribed RPS mandates. Considered in concert, SDCP's VMoP, which ranges from 8.0% to ~~37.0~~40.0% over the planning period, and MMoP provide a substantial aggregate renewable energy planning buffer, relative to applicable compliance mandates, as reflected in the following ~~tables~~tables.

	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2030</u>	<u>2031</u>				
<u>SB-100 RPS Procurement Requirement (% of Retail Sales)</u>	<u>41.3</u>	<u>44</u>	<u>46.7</u>	<u>49.3</u>	<u>52</u>	<u>54.7</u>	<u>57.3</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	
<u>SDCP's Minimum Internally Adopted RPS Procurement Target</u>	<u>58.3</u>	<u>52</u>	<u>54</u>	<u>58</u>	<u>70</u>	<u>78.3</u>	<u>81.7</u>	<u>85</u>	<u>88</u>	<u>91</u>	<u>94</u>	<u>97</u>	
<u>SDCPs Voluntary Margin Over Procurement (% of Retail Sales)</u>	<u>17</u>	<u>8</u>	<u>7.3</u>	<u>8.7</u>	<u>18</u>	<u>23.6</u>	<u>24.4</u>	<u>25</u>	<u>28</u>	<u>31</u>	<u>34</u>	<u>37</u>	
<u>SDCP's Minimum Margin of Over Procurement (% of Retail Sales)</u>	<u>5.8</u>	<u>5.2</u>	<u>5.4</u>	<u>5.8</u>	<u>7</u>	<u>7.8</u>	<u>8.2</u>	<u>8.5</u>	<u>8.8</u>	<u>9.1</u>	<u>9.4</u>	<u>9.7</u>	<u>10</u>

<u>SCDP's Aggregate Margin of Over-Procurement (% of Retail Sales)</u>	<u>22.8</u>	<u>13.2</u>	<u>12.7</u>	<u>14.5</u>	<u>25</u>	<u>31.5</u>	<u>32.5</u>	<u>33.5</u>	<u>36.8</u>	<u>40.1</u>	<u>43.4</u>	<u>46.7</u>	<u>50</u>
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2023-2029

	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>
<u>SB 100 RPS Procurement Requirement (% of Retail Sales)</u>	<u>41.3</u>	<u>44</u>	<u>46.7</u>	<u>49.3</u>	<u>52</u>	<u>54.7</u>	<u>57.3</u>
<u>SDCP's Minimum Internally Adopted RPS Procurement Target</u>	<u>58.3</u>	<u>52</u>	<u>54</u>	<u>58</u>	<u>70</u>	<u>78.3</u>	<u>81.7</u>
<u>SDCPs Voluntary Margin Over-Procurement (% of Retail Sales)</u>	<u>17</u>	<u>8</u>	<u>7.3</u>	<u>8.7</u>	<u>18</u>	<u>23.6</u>	<u>24.4</u>
<u>SDCP's Minimum Margin of Over-Procurement (% of Retail Sales)</u>	<u>5.8</u>	<u>5.2</u>	<u>5.4</u>	<u>5.8</u>	<u>7</u>	<u>7.8</u>	<u>8.2</u>
<u>SCDP's Aggregate Margin of Over-Procurement (% of Retail Sales)</u>	<u>22.8</u>	<u>13.2</u>	<u>12.7</u>	<u>14.5</u>	<u>25</u>	<u>31.5</u>	<u>32.5</u>

2030-2035

	<u>2030</u>	<u>2031</u>	<u>2032</u>	<u>2033</u>	<u>2034</u>	<u>2035</u>
<u>SB 100 RPS Procurement Requirement (% of Retail Sales)</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>	<u>60</u>
<u>SDCP's Minimum Internally Adopted RPS Procurement Target</u>	<u>85</u>	<u>88</u>	<u>91</u>	<u>94</u>	<u>97</u>	<u>100</u>
<u>SDCPs Voluntary Margin Over-Procurement (% of Retail Sales)</u>	<u>25</u>	<u>28</u>	<u>31</u>	<u>34</u>	<u>37</u>	<u>40</u>
<u>SDCP's Minimum Margin of Over-Procurement (% of Retail Sales)</u>	<u>8.5</u>	<u>8.8</u>	<u>9.1</u>	<u>9.4</u>	<u>9.7</u>	<u>10</u>
<u>SCDP's Aggregate Margin of Over-Procurement (% of Retail Sales)</u>	<u>33.5</u>	<u>36.8</u>	<u>40.1</u>	<u>43.4</u>	<u>46.7</u>	<u>50</u>

-	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
SB-100-RPS-Procurement Requirement (% of Retail Sales)	38.5	41.3	44	46.7	49.3	52	54.7	57.3	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS-Procurement Target	54.2	58.3	52.0	56.2	70.8	75.0	78.3	81.7	85.0	88.0	91.0	94.0	97.0
SDCPs Voluntary Margin Over Procurement (% of Retail Sales)	15.7	17.0	8.0	9.5	21.5	23.0	23.6	24.4	25.0	28.0	31.0	34.0	37.0
SDCP's Minimum Margin of Over Procurement (% of Retail Sales)	5.4	5.8	5.2	5.6	7.1	7.5	7.8	8.2	8.5	8.8	9.1	9.4	9.7
SCDP's Aggregate Margin of Over Procurement (% of Retail Sales)	21.1	22.9	13.2	15.1	28.6	30.5	31.5	32.5	33.5	36.8	40.1	43.4	46.7

2023-2029

	2023	2024	2025	2026	2027	2028	2029
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SB 100 RPS Procurement Requirement (% of Retail Sales)	41.3	44	46.7	49.3	52	54.7	57.3
SDCP's Minimum Internally Adopted RPS Procurement Target	58.3	52	54	58	70	78.3	81.7
SDCPs Voluntary Margin Over Procurement (% of Retail Sales)	17	8	7.3	8.7	18	23.6	24.4
SDCP's Minimum Margin of Over Procurement (% of Retail Sales)	5.8	5.2	5.4	5.8	7	7.8	8.2
SDCP's Aggregate Margin of Over Procurement (% of Retail Sales)	22.8	13.2	12.7	14.5	25	31.5	32.5

2030-2035

	2030	2031	2032	2033	2034	2035
SB 100 RPS Procurement Requirement (% of Retail Sales)	60	60	60	60	60	60
SDCP's Minimum Internally Adopted RPS Procurement Target	85	88	91	94	97	100
SDCPs Voluntary Margin Over Procurement (% of Retail Sales)	25	28	31	34	37	40
SDCP's Minimum Margin of Over Procurement (% of Retail Sales)	8.5	8.8	9.1	9.4	9.7	10
SDCP's Aggregate Margin of Over Procurement (% of Retail Sales)	33.5	36.8	40.1	43.4	46.7	50

SDCP will effectively ensure its compliance with applicable RPS mandates by procuring in consideration of internal renewable energy goals that meaningfully exceed state-adopted requirements. SDCP currently provides a minimum 50% renewable energy content target to ~~all~~ [most](#) customers as part of its default retail service offering, [PowerOn](#). SDCP's governing board may periodically consider increases to such renewable energy content for purposes of ensuring that SDCP differentiates its supply portfolio from applicable state-mandated renewable content. The extent to which SDCP will exceed statewide RPS mandates will be dependent upon a variety of factors, including RPS product availability, product cost and budgetary impacts and timely

product deliveries from generating facilities under contract with SDCP. As SDCP's governing board considers and adopts changes to its internal renewable energy procurement targets, the organization will accordingly update future RPS planning documents to reflect such changes.

IX.~~A~~~~B~~.2 MMoP Scenarios

SDCP plans to meet the annual program renewable goals reflected in the table presented in Section IX (above), including the MMoPs reflected therein. As reflected in this table, SDCP's anticipated MMoP percentages range from ~~11.8~~5.2% to ~~16.2~~210.0% in ~~2034~~2035. The renewable net short included in the RNS Quantitative Template also incorporates the additional RPS-eligible renewable energy need resulting from SDCP's VMoP, which exceeds SDCP's MMoP and reflects its internally adopted renewable energy procurement goal that increases from 50% in 2022 to 85% in 2030 and 100% in 2035.

During its bid evaluation and supplier selection processes, SDCP considers a variety of risks and will explicitly incorporate such risks into its MMoP calculation after related contracting processes are complete and project development progress (for new-build renewable projects) is being tracked by SDCP staff. Based on the information gathered during SDCP's contract management process (which focuses on key milestone achievement and deviations from initial project development schedules for new-build projects), SDCP may adjust expected renewable energy deliveries. To the extent that adjusted future deliveries meaningfully differ from SDCP's previous expectations, additional RPS procurement may be pursued to ensure that SDCP maintains its desired MMoP and related minimum customer delivery commitments.

SDCP will also model demand-side sensitivities that may impact MMoP calculations. This will be particularly important during administration of SDCP's expansion activities, as participation rates are expected to be most volatile during such periods of time. In addition to load variability resulting from customer participation levels, SDCP will also monitor electric

vehicle (“EV”) penetration rates, net energy metering participation rates and other considerations that may impact overall customer energy requirements and related demand-based MMoP calculations.

X. Bid Solicitation Protocol

~~**X.A. Solicitation Protocols for Renewables Sales**~~

~~SDCP does not have immediate plans to issue a solicitation for sales of renewable energy products. If such a need arises in the future, however, SDCP will consider a protocol that: 1) ensures that SDCP remains compliant with applicable RPS procurement mandates; 2) minimizes overall portfolio costs to the greatest extent practical; and 3) provides sufficient flexibility to accommodate reasonably anticipated supply side and demand side changes that could impact SDCP’s overall renewable energy requirements.~~

X.~~A~~^B. Bid Selection Protocols

(i) Description of Bid Solicitation Protocols.

Consistent with Public Utilities Code section 399.13(a)(5)(C),²⁴ SDCP shall conduct solicitations for requisite energy resources, including specific needs for eligible renewable energy resources (reflecting locational preferences, when applicable, for such resources), generating capacity, and required online dates to assist in determining what resources fit best within its supply portfolio. Since CCA program governing boards are comprised of local elected

²⁴ Cal. Pub. Util. Code § 399.13(a)(5)(C) (“Standard terms and conditions to be used by all electrical corporations in contracting for eligible renewable energy resources, including performance requirements for renewable generators. A contract for the purchase of electricity generated by an eligible renewable energy resource, at a minimum, shall include the renewable energy credits associated with all electricity generation specified under the contract. The standard terms and conditions shall include the requirement that, no later than six months after the commission’s approval of an electricity purchase agreement entered into pursuant to this article, the following information about the agreement shall be disclosed by the commission: party names, resource type, project location, and project capacity.”).

officials, these solicitation and procurement decisions are overseen by elected representatives of the community. These solicitation and procurement decisions will seek to comply with targets and preferences that are considerate of local priorities and interests. Any new renewable energy supply agreements resulting from ongoing contract negotiations and future solicitation processes will be brought to SDCP's governing board for approval prior to execution.

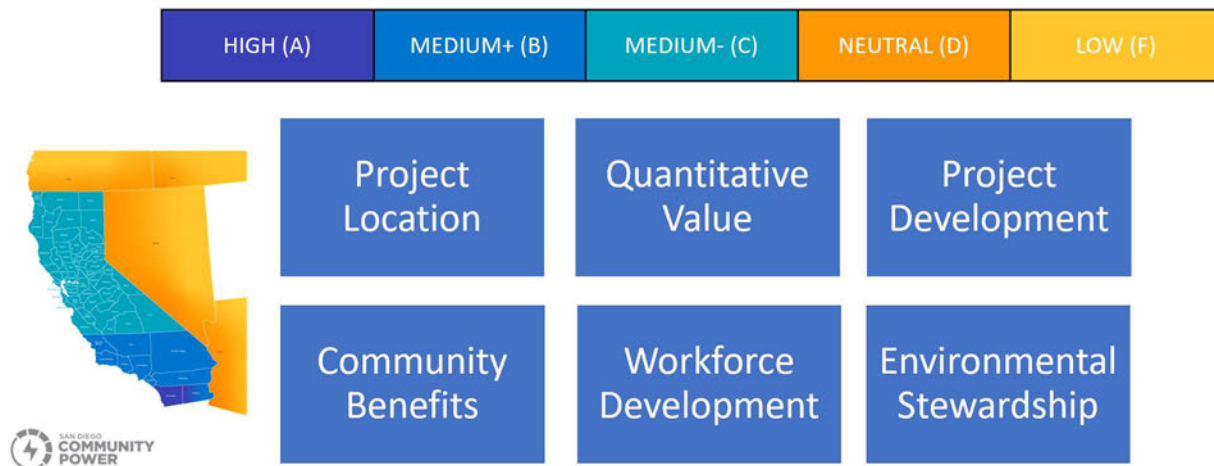
Pursuant to Public Utilities Code 399.13(a)(6)(C),²⁵ SDCP's RFPs include a variety of considerations in related bid solicitation protocols as well as the proposal evaluation and selection process, including:

1. Price and relative value within SDCP's supply portfolio;
2. Project location and benefits to the local economy and workforce;
3. Potential economic benefits created within communities with high levels of poverty and unemployment;
4. Project development status, including but not limited to progress toward interconnection, deliverability, siting, zoning, permitting, and financing requirements;
5. Qualifications, experience developing projects in California and/or with CCAs, financial stability, and structure of the prospective project team (including its ownership);
6. Environmental impacts and related mitigation requirements, including impacts to air pollution within communities that have been disproportionately impacted by the existing generating fleet;
7. Potential impacts to grid reliability;
8. Interconnection status, including queue position, full deliverability of Resource Adequacy capacity, and related study completion, if applicable
9. Acceptance of SDCP's standard contract terms; and
10. Development milestone schedule, if applicable.

These ~~criteria~~ criterion are summarized in six categories that are part of SDCP's energy project evaluation criteria. Each project is scored (A to F) on each ~~criterion~~ criteria before review

²⁵ Cal. Pub. Util. Code § 399.13(a)(6)(C) ("Consistent with the goal of increasing California's reliance on eligible renewable energy resources, the renewable energy procurement plan shall include all of the following: A bid solicitation setting forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any.").

by SDCP’s executives and board. A summary of the criteria is below.



SDCP’s Inclusive and Sustainable Workforce Policy, adopted January 28, 2021, considers impacts to the local economy and workforce. SDCP will specifically consider “the employment growth associated with the construction and operation of eligible renewable energy resources.”²⁶ More specifically, to the extent SDCP procures new RPS resources in solicitations where qualitative factors are considered, SDCP will include a qualitative assessment of the extent to which proposed project development activities will support this goal. Such determinations will be based on information provided by the prospective supplier and SDCP’s independent assessment of such information. When SDCP procures RPS resources, it will request bidders to submit information on projected California employment growth during construction and operation. This data will include the expected number of hires, duration of hire, and an indication of whether the bidder has entered into Project Labor Agreements or Maintenance Labor Agreements in California for the proposed project.

Pursuant to Public Utilities Code section 366.2(m), Community Choice Aggregators like

²⁶ See *Inclusive and Sustainable Workforce Policy*, adopted January 28, 2021, available at <https://sdcommunitypower.org/resources/meeting-notes/>.

SDCP are required to annually submit a report to the CPUC, which provides a (1) detailed and verifiable plan for increasing procurement from small, local, and diverse business enterprises; and (2) a report regarding its procurement from women, minority, disabled veteran, and LGBT business enterprises.²⁷ On March 1, 2025, SDCP submitted its *Supplier Diversity 2024 Annual Report and 2025 Annual Plan* to the Commission in compliance with SB 255 and CPUC General Order (GO) 156.²⁸ As outlined in its most recent report and plan, SDCP continues to build its Supplier Diversity program which aims to support, to the extent applicable by law, the principles of the CPUC GO 156 by increasing the number of diverse suppliers, including power providers, to SDCP.²⁹ SDCP maintains a dedicated webpage to promote its Supplier Diversity program, encourage participation, and provide resources for vendors and suppliers.³⁰

(ii) Consideration of Resources Located in Disadvantaged Communities.

Pursuant to Public Utilities Code section 399.13(a)(8)(A), SDCP will also consider the inclusion of evaluative preference for “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 greenhouse gases.”³¹ To the extent that SDCP procures RPS resources through solicitations where qualitative

²⁷ See *Supplier Diversity* at <https://www.cpuc.ca.gov/supplierdiversity/>.

²⁸ See [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/bco/cca-procurement-reports/2024/sdcp_go-156_2024-annual-report-and-2025-annual-plan-\(002\).pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/bco/cca-procurement-reports/2024/sdcp_go-156_2024-annual-report-and-2025-annual-plan-(002).pdf).

²⁹ See Section 11, Page 23 at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/bco/go-156-d22-04-035.pdf>.

³⁰ See *Supplier Diversity* at <https://sdcommunitypower.org/supplier-diversity/>.

³¹ Cal. Pub. Util. Code § 399.13(a)(8)(A) (“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

factors are considered, impact on disadvantaged communities will be considered.

afflicted with poverty or high unemployment, or that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and greenhouse gases.”).

(iii) Alignment of Bid Selection Criteria with RPS Procurement Plan.

SDCP's bid solicitation criteria align with all sections of its RPS plan, especially regarding its stated needs, goals, and preferences. Past and planned solicitations are consistent with the portfolio supply and demand assessment provided in RPS Plan Section IV and SDCP's renewable net short position in Section VIII.

(iv) Description of Ongoing, Planned, and Proposed Solicitations

SDCP's most recent RPS solicitations, RFO for Clean-Firm Resources, Second RFO for Solar Advantage (Disadvantaged Communities Green Tariff), and rolling Local Renewable Energy and Energy Storage RFI, can be found at <https://sdcommunitypower.org/resources/solicitations/>. All past solicitations can also be reviewed on that same webpage. SDCP is waiting to see where federal legislation ends up on the ITC, PTC, and tariffs before planning any additional RPS solicitations.

~~Consistent with Public Utilities Code section 399.13(a)(5)(C),³² SDCP shall conduct solicitations for requisite energy resources, including specific needs for eligible renewable energy resources (reflecting locational preferences, when applicable, for such resources), generating capacity, and required online dates to assist in determining what resources fit best within its supply portfolio. Since CCA program governing boards are comprised of local elected officials, these solicitation and procurement decisions are overseen by elected representatives of~~

³² Cal. Pub. Util. Code § 399.13(a)(5)(C) (“Standard terms and conditions to be used by all electrical corporations in contracting for eligible renewable energy resources, including performance requirements for renewable generators. A contract for the purchase of electricity generated by an eligible renewable energy resource, at a minimum, shall include the renewable energy credits associated with all electricity generation specified under the contract. The standard terms and conditions shall include the requirement that, no later than six months after the commission’s approval of an electricity purchase agreement entered into pursuant to this article, the following information about the agreement shall be disclosed by the commission: party names, resource type, project location, and project capacity.”).

~~the community. These solicitation and procurement decisions will seek to comply with targets and preferences that are considerate of local priorities and interests. Any new renewable energy supply agreements resulting from ongoing contract negotiations and future solicitation processes will be brought to SDCP's governing board for approval prior to execution.~~

~~SDCP's most recent RPS solicitations, Q4 2022 Long Term California RPS Eligible Renewable Energy RFP, Q1 2023 Long Term California RPS Eligible Renewable Energy RFP, and Q2 2023 Request for Offers for Standalone Storage can be found at <https://sdecommunitypower.org/resources/solicitations/>. Pursuant to Public Utilities Code 399.13(a)(6)(C),³³ SDCP's RFP included a variety of considerations in related bid solicitation protocols as well as the proposal evaluation and selection process, including:~~

- ~~1. Price and relative value within SDCP's supply portfolio;~~
- ~~2. Project location and benefits to the local economy and workforce;~~
- ~~3. Potential economic benefits created within communities with high levels of poverty and unemployment;~~
- ~~4. Project development status, including but not limited to progress toward interconnection, deliverability, siting, zoning, permitting, and financing requirements;~~
- ~~5. Qualifications, experience developing projects in California and/or with CCAs, financial stability, and structure of the prospective project team (including its ownership);~~
- ~~6. Environmental impacts and related mitigation requirements, including impacts to air pollution within communities that have been disproportionately impacted by the existing generating fleet;~~
- ~~7. Potential impacts to grid reliability;~~
- ~~8. Interconnection status, including queue position, full deliverability of Resource Adequacy capacity, and related study completion, if applicable~~
- ~~9. Acceptance of SDCP's standard contract terms; and~~
- ~~10. Development milestone schedule, if applicable.~~

³³ Cal. Pub. Util. Code § 399.13(a)(6)(C) (“Consistent with the goal of increasing California’s reliance on eligible renewable energy resources, the renewable energy procurement plan shall include all of the following: A bid solicitation setting forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any.”).

~~SDCP's Inclusive and Sustainable Workforce Policy, adopted January 28, 2021, considers impacts to the local economy and workforce. SDCP will specifically consider "the employment growth associated with the construction and operation of eligible renewable energy resources."³⁴ More specifically, to the extent SDCP procures new RPS resources in solicitations where qualitative factors are considered, SDCP will include a qualitative assessment of the extent to which proposed project development activities will support this goal. Such determinations will be based on information provided by the prospective supplier and SDCP's independent assessment of such information. When SDCP procures RPS resources, it will request bidders to submit information on projected California employment growth during construction and operation. This data will include the expected number of hires, duration of hire, and an indication of whether the bidder has entered into Project Labor Agreements or Maintenance Labor Agreements in California for the proposed project.~~

~~Pursuant to Public Utilities Code section 366.2(m), Community Choice Aggregators like SDCP are required to annually submit a report to the CPUC, which provides a (1) detailed and verifiable plan for increasing procurement from small, local, and diverse business enterprises; and (2) a report regarding its procurement from women, minority, disabled veteran, and LGBT business enterprises.³⁵ On March 1, 2024, SDCP submitted its *Supplier Diversity 2023 Annual Report and 2024 Annual Plan* to the Commission in compliance with SB 255 and CPUC General Order (GO) 156.³⁶ As outlined in its most recent report and plan, SDCP continues to build its~~

³⁴~~See *Inclusive and Sustainable Workforce Policy*, adopted January 28, 2021, available at <https://sdcommunitypower.org/resources/meeting-notes/>.~~

³⁵~~See *Supplier Diversity* at <https://www.cpuc.ca.gov/supplierdiversity/>.~~

³⁶~~See <https://www.cpuc.ca.gov/media/cpuc-website/divisions/news-and-outreach/documents/bco/cca-procurement-reports/2023/sdep-go-156-2023-annual-report-and-2024-annual-plan-1.pdf> [https://www.cpuc.ca.gov/media/cpuc-website/divisions/news-and-outreach/documents/bco/cca-procurement-reports/2024/sdep-go-156-2024-annual-report-and-2025-annual-plan-\(002\).pdf](https://www.cpuc.ca.gov/media/cpuc-website/divisions/news-and-outreach/documents/bco/cca-procurement-reports/2024/sdep-go-156-2024-annual-report-and-2025-annual-plan-(002).pdf).~~

~~Supplier Diversity program which aims to support, to the extent applicable by law, the principles of the CPUC GO 156 by increasing the number of diverse suppliers, including power providers, to SDCP.³⁷ SDCP maintains a dedicated webpage to promote its Supplier Diversity program, encourage participation, and provide resources for vendors and suppliers.³⁸~~

~~Pursuant to Public Utilities Code section 399.13(a)(8)(A), SDCP will also consider the inclusion of evaluative preference for “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 greenhouse gases.”³⁹ To the extent that SDCP procures RPS resources through solicitations where qualitative factors are considered, impact on disadvantaged communities will be considered.—~~

X.BA. Solicitation Protocols for Renewables Sales

SDCP does not have immediate plans to issue a solicitation for sales of renewable energy products. If such a need arises in the future, however, SDCP will consider a protocol that: 1) ensures that SDCP remains compliant with applicable RPS procurement mandates; 2) minimizes overall portfolio costs to the greatest extent practical; and 3) provides sufficient flexibility to accommodate reasonably anticipated supply-side and demand-side changes that could impact SDCP’s overall renewable energy requirements.

X.C. LCBF Criteria

The Least-Cost Best Fit methodologies approved by the Commission pursuant to

³⁷ ~~See Section 11, Page 23 at https://www.cpuc.ca.gov/-/media/cpuc_website/divisions/news-and-outreach/documents/bco/go-156-d22-04-035.pdf.~~

³⁸ ~~See *Supplier Diversity* at <https://sdccommunitypower.org/supplier-diversity/>.~~

³⁹ ~~Cal. Pub. Util. Code § 399.13(a)(8)(A) (“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 greenhouse gases.”).~~

D.04-07-029, D.11-04-030, D.12-11-016, D.14-11-042, and D.16-12-044 are expressly only directly applicable to the IOUs and the Commission does not have jurisdiction over the solicitation protocols of CCAs. However, consistent with Public Utilities Code sections 399.13(a)(9), SDCP will consider best-fit attributes that support a balanced mix of resources to help support reliability of the electrical grid.⁴⁰

In particular, SDCP considers “least cost best fit” (“LCBF”) during the evaluation of responses to all of its renewable energy solicitations and will continue to do so in future solicitations. From SDCP’s perspective, use of the term “costs” appropriately includes considerations beyond the basic price of renewable energy. More specifically, costs include a broad range of considerations, such as: 1) reputational damage resulting from failure to meet state-mandated and/or internally established renewable energy procurement targets; 2) compliance penalties resulting from failed project development efforts or delivery shortfalls; 3) administrative complexities related to dealing with inexperienced suppliers (such as prolonged contract negotiation processes and uncertainties related to project milestone timing and achievement); and 4) impacts to planning certainty resulting from higher risk projects. These factors, as well as various others, will continue to be considered by SDCP as components of its cost evaluation process, which may lead to the selection of offers that aren’t necessarily the lowest cost option(s), as expressed on a dollar-per-MWh basis. With regard to “fit,” this aspect of a prospective supply opportunity has as much to do with compatibility (between SDCP and its suppliers) and alignment with key local objectives as it does with balancing customer usage and expected project deliveries, particularly when considering long-term contracting opportunities

⁴⁰ Cal. Pub. Util. Code § 399.13(a)(9) (“In soliciting and procuring eligible renewable energy resources, each retail seller shall consider the best-fit attributes of resource types that ensure a balanced resource mix to maintain the reliability of the electrical grid.”).

that will necessitate a constructive working relationship over a period of ten years or more.

SDCP also interprets the term “fit” to mean the general suitability of a project opportunity in promoting grid reliability – while SDCP has no explicit operational or maintenance responsibilities related to the local distribution system serving its customers or the bulk electric system at large, it is aware of the profound importance of supporting grid reliability through its procurement processes. With this in mind, SDCP will make best efforts to balance the demands of California’s rigorous RPS compliance mandates and its interest in promoting such reliability. This is no small task, and SDCP expects that considerations related to grid reliability will be incorporated at each stage of its planning and procurement processes but also acknowledges that the full scope of its RPS contract/resource portfolio (including related impacts to grid reliability) will significantly evolve throughout the ~~organization’s~~[organizations](#) operating history. Over time, SDCP expects to thoughtfully assemble a diversified portfolio of RPS contracts/resources that will not only contribute to SDCP’s achievement of applicable compliance mandates but also to improved stability and reliability of California’s electric system. As such, SDCP’s LCBF methodology will consider a broad range of components, including those previously noted, balancing a variety of pertinent considerations at the time each renewable purchase opportunity is being evaluated.

Additionally, the requirement of Section 399.13(a)(8)(A) to give preference to renewable projects located in certain communities is expressly only applicable to “electrical corporations” and is not mandatory for CCAs.⁴¹ However, SDCP recognizes the need to

⁴¹ Cal. Pub. Util. Code § 399.13(a)(8)(A) (“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 greenhouse gases.”).

help mitigate the impacts of air pollution in regions of the state where communities have been disproportionately impacted by the existing generating fleet as well as the need to bring economic benefits to communities with high levels of poverty and unemployment. Consistent with this recognition, SDCP will consider the manner in which air pollution may be impacted during its renewable energy solicitation process(es) and related project selection.

XI. Safety Considerations

San Diego Community Power holds safety as a top priority. Since SDCP does not own, operate, or control generation facilities, SDCP's procurement of renewable resources will not present any unique safety risks. This section describes how SDCP has taken actions to reduce the safety risks that may be posed by its renewable resource portfolio and how SDCP supports the state's environmental, safety, and energy policy goals.

In its procurement efforts, ~~SDCP will consider the extent to which incorporating project safety and risk mitigation requirements is necessary and appropriate in contracting.~~ SDCP's standard contracts include ~~has generally included safety terms in its contracts requiring~~ the requirements for sellers to comply with all laws and prudent operating practices relating to the operation and maintenance of the renewable facility and the generation and sale of the renewable product. Additionally, the seller shall take all reasonable safety precautions with respect to the operation, maintenance, repair and replacement of the facility, and notify SDCP if seller becomes aware of any circumstances relating to the facility that creates an imminent risk of damage or injury to any person or any person's property, taking prompt, reasonable action to prevent such damage or injury.

The recent incidences of battery energy storage fires have increased the industry's

attention to battery safety. While the fires at Moss Landing and Gateway Energy Storage differ either in battery chemistry or configuration (non-containerized) from battery storage contracted under SDCP's long-term portfolio, SDCP closely tracks any efforts by municipalities in its jurisdiction to enact additional safety measures for battery energy storage and supports the adoption of battery storage system development and siting guidelines that underscore public safety and community impact. Additionally, SDCP is contracting with battery storage engineering firms to help inform SDCP's future contracting requirements with respect to battery operations and safety, including monitoring requirements and enforcement. ~~SDCP is aware that requesting more stringent processes and/or requirements (related to safety and/or other concerns) may trigger requested price increases by the seller. To the extent that product pricing would meaningfully increase due to the inclusion of such provisions, SDCP would need to evaluate budgetary impacts and other risks before proceeding.~~

In addition, SDCP has provided additional information below on its existing safety practices.

XI.1. Wildfire Risks and Vegetation Management

In ongoing and future negotiations, SDCP will ensure that its contracts with renewable generating facilities will require the facility operator to comply with all relevant safety requirements. This will be accomplished, in part, through contract provisions that require the counterparty to operate and maintain the facility in compliance with all relevant laws and prudent operating practices, including relevant safety and environmental protection standards.

At this time, SDCP has yet to adopt specific procurement policies or preferences focused on the acquisition of forest biomass resources. SDCP is aware of the mitigating impacts that biomass generators, which use forestry waste as feedstock, may have on wildfire risk and will consider the adoption of a related procurement policy in the future.

One of the evaluative criteria considered by SDCP is project location. Part of this evaluation will include an analysis of project location with respect to wildfire risk. Projects that are sited in a high wildfire risk area may be scored lower, and the expected output associated with such project(s) may be reduced to account for potential reductions in output that may occur if fires happen to compromise the project or surrounding infrastructure. SDCP is aware of instances when CCAs have received lower-than-expected deliveries from renewable generating facilities that were required to shut down or reduce output when fire risk compromised such electrical infrastructure. Based on this information, generating assets located in areas that are historically prone to fire risk will need to be considered in light of the potential for reduced output and resultant impacts to SDCP's RPS compliance standing.

XI.2. Decommissioning Facilities

As SDCP continues to complete long-term contracting efforts, it has not developed any plans or requirements related to the disposition of associated generating facilities following completion of applicable delivery terms. However, the developer's plan for decommissioning factors into the qualitative assessment. Further, in contract negotiations, SDCP evaluates, if provided, a project safety plan or a similar type of reporting document, which will include information on procedures for identifying and remediating safety incidents, as well as describing any relevant requirements (such as those associated with the permitting of the facility) for the decommissioning of the facility.

XI.3. Climate Change Adaptation

SDCP's internally adopted portfolio targets, relating to the use of renewable energy and other carbon-free energy supply, are intended to support the CAPs of Member Agencies and the San Diego Region at large. In future solicitations, SDCP will consider updating its bid evaluation criteria in consideration of the policies and preferences of its membership, including but not limited to risks associated with facilities located in regions that are forecasted to be impacted by higher instances of sea-level rise, flooding, wildfires, and/or elevated temperatures.

XI.4. Impacts During Public Safety Shut-off (PSPS) Events

Potential impacts related to PSPS events are uncertain. However, regarding resource planning, it is likely that a relatively short-duration PSPS event impacting SDCP [\(in which it would be in close coordination with SDG&E\)](#) would marginally reduce retail electric sales and, as a result, would generate a very small increase in the proportionate share of renewable energy supply accruing to SDCP (if renewable supply agreements continue to perform as expected

during such events). As SDCP executes contracts with renewable generating facilities, it will evaluate the risk of the loss of generation associated with PSPS events both for facilities that are already online and for facilities that are still under development. Based on impact of prior PSPS events to generating facilities, SDCP anticipates that the total quantity of any PSPS-related reductions in RPS-eligible generation will be relatively small and would likely be offset by the potential reduction in retail sales that would result from PSPS events that directly impact SDCP's customers. Therefore, the likelihood of a material impact to SDCP's renewable energy planning process or related performance metrics seems unlikely.

XI.5. Biomass Procurement

SDCP's neutral position on biomass procurement remains unchanged. While SDCP has no specific preferences for or against biomass resources, the prospect of procuring such resources will be dependent upon offers received during future solicitation processes. SDCP has executed a 5-year deal with an existing biomass facility ~~and remains in negotiation with a new-build facility that came to SDCP through the clean-firm RFO that was issued in 2022.~~ [SDCP also issued a second Clean-Firm RFO on May 9, 2025. However, SDCP did not receive any conforming bids. This is likely due to the limited available projects and delays in interconnection queues. There is a limited pool of projects that are available with commercial operations planned by 2028-2031.](#) To the extent that future biomass offers are competitive (with similar offers received from other resource types) or in the event SDCP adopts policies explicitly supporting the acquisition of biomass energy resources, SDCP will consider the inclusion of biomass energy within its renewable energy supply portfolio.

XII. Consideration of Price Adjustments Mechanisms

During ongoing contracting processes and future solicitations, and consistent with SB 350

and SB 100, SDCP will review the prospects of incorporating price adjustments in contracts with online dates more than 24 months after the date of contract execution. As noted in the ACR, such price adjustments could include price indexing to key components or to the Consumer Price Index.

XIII. Curtailment Frequency, Cost, and Forecasting

~~This Section responds to the questions presented in Section 6.13 of the ACR⁴² and describe SDCP's strategies and experience so far in managing SDCP's exposure to negative pricing events, overgeneration, and economic curtailment for SDCP's region and portfolio of renewable resources.~~

XIII.1. Factors Having the Most Impact on the Projected Increases in Incidences of Overgeneration and Negative Market Price Hours

~~SDCP will continue to monitor the California energy market, including information and considerations related to energy curtailment, potential cost impacts, contracting considerations, and other concerns. The following represents SDCP's understanding of this topic, which may impact future procurement processes.~~

~~Due in large part to the rapid increase in the amount of wind and solar generating facilities that have been brought online throughout the western United States, the California Independent System Operator's ("CAISO") balancing authority area has experienced an increasing frequency and magnitude of curtailment and negative pricing events. The U.S. Energy Information Agency ("EIA") estimates that as of April 2024, California has 37,507 MW of installed solar capacity,~~

⁴² See *Assigned Commissioner and Assigned Administrative Law Judge's Ruling Identifying Issues and Schedule of Review for 2024 Renewables Portfolio Standard Procurement Plans*, May 17, 2024 at p. 31-32.

with 17,193 MW of that total being behind-the-meter solar.⁴³ The CAISO reports that it has 19,628 MW of utility-scale solar and 8,352 MW of utility-scale wind currently installed within its balancing authority area.⁴⁴ This increased capacity results in discrete periods where the generation from wind and solar resources exceeds the total load in the CAISO during those periods. The monthly maximum load served by wind and solar in the CAISO has averaged 78.6% over the past 3 years (May 2021 to May 2024), and in April of 2024 the monthly maximum load served by wind and solar was 109.6 percent,⁴⁵ while the maximum 5-minute amount of all renewables serving load was 117.3 percent.⁴⁶ To address the resulting instances of over supply, the amount of curtailment of wind and solar in the CAISO has significantly increased each year from 2015 through 2024, totaling 187,000 MWh in 2015, 308,000 MWh in 2016, 379,510 MWh in 2017, 461,043 MWh in 2018, 965,241 MWh in 2019, 1,586,500 MWh in 2020, 1,504,803 in 2021, 2,449,248 in 2022, and 2,659,527 in 2023.⁴⁷ As of July 5, 2024, the total curtailment of solar and wind year-to-date is 2,860,176 MWh.⁴⁸ Curtailment is typically the highest during the months of March, April, and May when hydroelectric generation is historically at its highest.

SDCP will continue to monitor this situation to the extent such circumstances are likely to impact procurement activities and contract administration. If prospective renewable generating

⁴³ EIA, *Electric Power Monthly, Table 6.2.B. Net Summer Capacity Using Primarily Renewable Energy Sources and by State, April 2024 and 2023 (Megawatts)*, available at: https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=table_6_02_b.

⁴⁴ CAISO, *What are we doing to green the grid?*, updated July 10, 2024, at <http://www.caiso.com/informed/Pages/CleanGrid/default.aspx>.

⁴⁵ CAISO, *Monthly Renewables Performance Report, May 2024*, available at <https://www.caiso.com/documents/monthly-renewables-performance-report-may-2024.html>.

⁴⁶ CAISO, *Monthly Renewables Performance Report, April 2024*, available at <https://www.caiso.com/documents/monthly-renewables-performance-report-apr-2024.html>.

⁴⁷ CAISO, *Managing Oversupply, Wind and Solar Curtailment Totals*, updated May 9, 2023, available at <http://www.caiso.com/informed/Pages/ManagingOversupply.aspx>.

⁴⁸ CAISO, *Wind and Solar Curtailment, July 5, 2024*, available at <https://www.caiso.com/documents/wind-solar-real-time-dispatch-curtailment-report-jul-05-2024.pdf>.

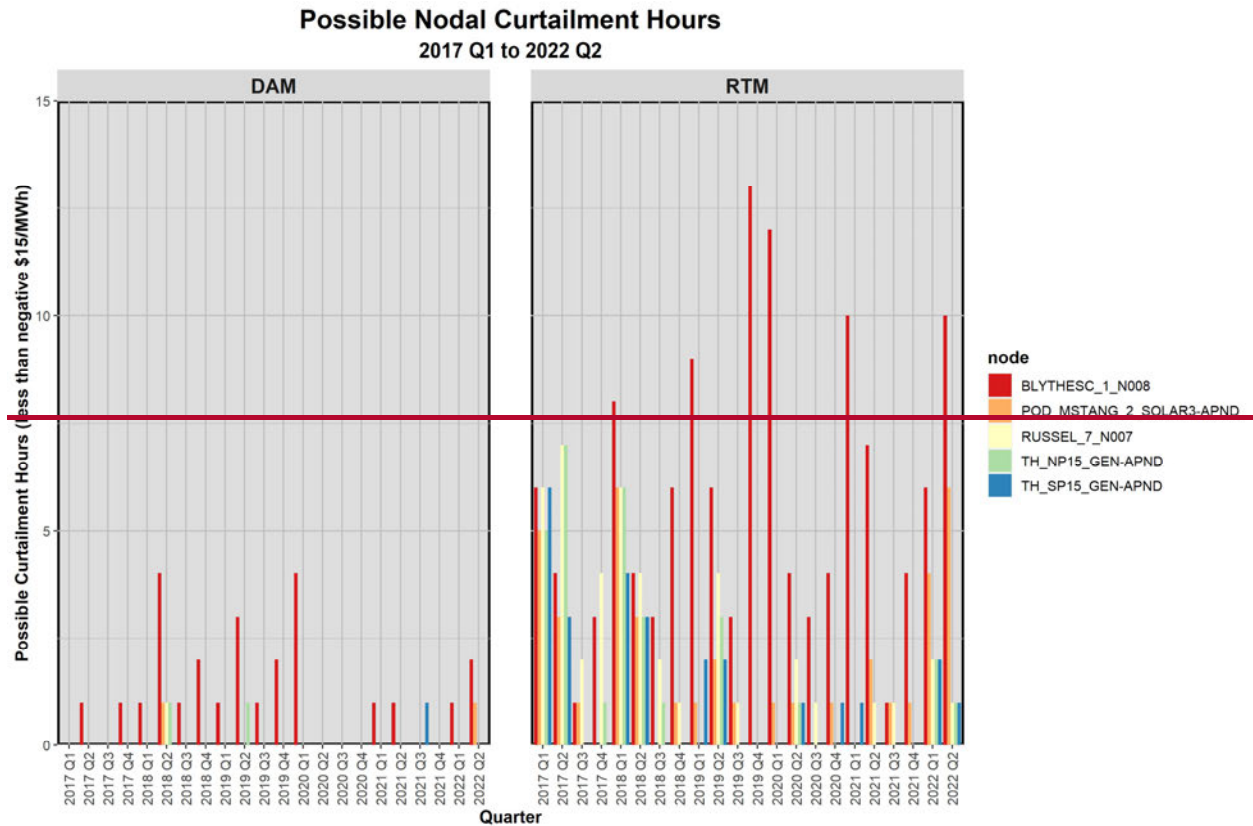
~~opportunities are located in areas that are prone to frequent instances of negative market pricing (based on available historical data), SDCP will be sure to evaluate such data to better understand prospective financial impacts and/or pursue contractual pricing structures that will insulate the CCA program from such risks. When SDCP considers specific renewable project/contract opportunities in the future, it will likely assume that incidences of over generation will continue to occur (or increase) in areas of the state with low load and relatively high levels of generation. To the extent there are not opportunities to store, export or otherwise use such generation as it occurs, SDCP understands that market pricing would likely be suppressed to the extent that generation exceeds load; and to the extent that generation meaningfully exceeds load, market pricing could turn negative (or significantly negative). This concern was previously considered by SDCP and will continue to be considered when evaluating future renewable project/contract opportunities, and to the extent that certain project locations seem predisposed to incidences of negative pricing, SDCP will weigh such risk against other available project/contract opportunities. Ultimately, SDCP must satisfy its RPS procurement mandates and will need to procure among available opportunities, even if such opportunities present related risks to SDCP—in such instances, SDCP may seek to minimize its negative price risk through contract structures that alleviate these concerns for the buyer.~~

~~XIII.2. Written Description of Quantitative Analysis of Forecast of the Number of Hours Per Year of Negative Market Pricing for the Next 10 Years~~

~~Negative prices in the CAISO market can significantly impact the cost and overall value of renewable generating assets, particularly if such supply agreements apply market-based settlement mechanisms to determine charges assessed to the buyer. Thus, it is important that SDCP consider the siting of prospective renewable generating resources to avoid taking on unforeseen costs or lower than expected delivered energy quantities, which may result from~~

economic curtailments. For this reason, SDCP has endeavored to quantify the potential occurrence of negative pricing events within certain areas of the state that are known to include significant levels of renewable generating capacity. To improve its understanding of such risks, SDCP has assembled a historic negative pricing analysis with the average results of such analysis being used as SDCP's ten-year negative price forecast. SDCP notes that moderately negative prices are not expected to trigger meaningful economic curtailments, as the cost of procuring replacement RPS supply under index plus pricing arrangements would likely be equivalent in cost; in such instances, there would be little sense for SDCP to curtail renewable energy deliveries.

Below are several charts which illustrate the number of potential historic curtailment events that would have been triggered when nodal prices fell significantly negative. Estimates for the real-time market (RTM) have been averaged over the hour to promote comparability between day-ahead and RTM outcomes.



Using the historic data illustrated above, SDCP has created the following forecast that will be considered if future project opportunities are located adjacent to the specified nodes. If eventual project opportunities happen to be located in other geographic areas, SDCP would update its analysis based on the node in closest proximity to the prospective generating resource. This forecast methodology allows SDCP to estimate the quantity of time energy will be curtailed from a renewable energy project. Because curtailment hours occur frequently within the real time market, SDCP has also included a sample of its analyses for a subset of nodes that are known to be in close proximity to areas of the state in which prevalent renewable generation buildout has occurred. The color shading in the table is a visual cue reflecting curtailment density in certain hours of the year. This density will be helpful in determining the delivery profiles that may complement existing generating resources adjacent to the node as well as those that may exacerbate negative pricing. SDCP is mindful that it will need to annually evaluate relevant

variables, such as regional hydrologic conditions and generalized weather trends, to determine if any adjustments ought to be made to its forecast.

BLYTHESC_1_N008 RTM													
Hour	January	February	March	April	May	June	July	August	September	October	November	December	
1	.17	.50	.00	.17	.17	.00	.20	.20	.20	.00	.40	.20	
2	.17	.17	.00	.00	.00	.33	.00	.20	.00	.00	.20	.20	
3	.00	.17	.00	.00	.17	.17	.20	.20	.00	.00	.20	.00	
4	.00	.17	.00	.00	.00	.00	.00	.00	.00	.00	.20	.00	
5	.00	.00	.17	.00	.00	.00	.20	.20	.00	.00	.20	.00	
6	.17	.00	.00	.00	.33	.50	.20	.00	.00	.00	.40	.00	
7	.00	.00	.00	.00	.50	1.00	.40	.20	.20	.00	.00	.40	
8	.17	.50	.00	1.00	1.50	1.83	1.40	.40	.40	.40	.40	.80	
9	.83	1.67	1.50	3.17	3.33	1.50	.40	.40	1.00	1.20	1.60	1.80	
10	1.17	2.67	2.67	2.33	3.33	.67	.20	.40	1.60	2.20	2.60	3.60	
11	2.67	3.00	3.00	2.50	2.17	.67	.00	.20	1.20	2.20	2.20	4.00	
12	.83	2.83	2.50	2.83	2.17	.00	.20	.20	.80	2.40	2.60	2.60	
13	3.00	3.17	4.50	1.33	1.33	.00	.00	.00	.60	1.00	2.20	2.60	
14	1.00	3.83	4.33	2.17	1.33	.17	.00	.20	.60	2.40	1.20	2.40	
15	1.00	1.17	1.33	1.67	.83	.50	.20	.00	.40	1.60	2.00	2.40	
16	.67	3.00	3.00	1.50	.67	.00	.00	.00	.20	.80	1.40	.00	
17	.17	.17	3.00	1.50	1.00	.00	.00	.00	.00	.20	.60	.40	
18	.50	.17	.67	.17	.50	.00	.00	.00	.20	.00	.60	.80	
19	.17	.17	.17	.00	.00	.00	.00	.00	.20	.00	.80	.80	
20	.67	.50	.00	.00	.00	.00	.00	.20	.20	.00	.60	.40	
21	.67	.17	.00	.00	.17	.17	.00	.20	.60	.00	.60	.20	
22	.33	.50	.17	.00	.17	.33	.00	.00	.40	.00	1.00	.60	
23	.33	.17	.00	.00	.00	.17	.20	.00	.60	.00	.40	.20	
24	.17	.67	.33	.00	.00	.00	.00	.60	.20	.00	.40	.00	
Total Monthly Incidents of Neg.Pricing	14.83	28.33	30.33	20.33	19.67	8.00	3.80	3.80	9.60	14.40	22.80	24.40	
Average Monthly Incidents of Neg.Pricing	1.19	2.27	2.43	1.63	1.57	.64	.30	.30	.77	1.15	1.82	1.95	
Annual Adjustment Factor to be applied across 10-year forecast	7.41%	14.15%	15.14%	10.15%	9.82%	3.99%	1.90%	1.90%	4.79%	7.19%	11.38%	12.18%	
RUSSEL_7_N007 RTM													
Hour	January	February	March	April	May	June	July	August	September	October	November	December	
1	.17	.17	.00	.83	.50	.33	.20	.40	.00	.00	.00	.40	
2	.17	.17	.00	.83	.83	.50	.40	.20	.00	.00	.00	.40	
3	.00	.33	.00	.83	1.00	.17	.40	.40	.00	.00	.00	.40	
4	.00	.17	.00	.50	.83	.17	.20	.40	.00	.00	.00	.40	
5	.00	.00	.17	.50	.50	.00	.20	.20	.00	.00	.00	.40	
6	.00	.00	.00	.50	.50	.17	.20	.20	.00	.00	.00	.60	
7	.00	.00	.00	.50	.33	.83	.20	.20	.00	.00	.00	.80	
8	.00	.00	.00	.83	.33	.50	.40	.20	.20	.00	.00	.40	
9	.00	.50	.33	1.17	1.00	.50	.20	.20	.00	.00	.00	.40	
10	.00	1.00	.33	1.33	.67	.67	.00	.00	.00	.00	.00	.40	
11	.00	1.00	.67	.83	.67	.67	.00	.00	.00	.20	.00	.40	
12	.17	.33	.17	.67	1.00	.17	.00	.00	.00	.00	.00	.40	
13	.17	.17	.50	1.33	.50	.17	.00	.00	.00	.00	.00	.40	
14	.17	.17	1.00	1.17	.33	.17	.00	.00	.00	.00	.00	.20	
15	.17	.67	1.50	1.00	.67	.17	.00	.00	.00	.00	.00	.20	
16	.00	.83	2.17	1.00	.67	.17	.00	.20	.00	.00	.00	.20	
17	.00	.33	1.17	1.17	.67	.33	.20	.00	.20	.00	.00	.20	
18	.00	.00	.50	.33	1.00	.17	.00	.00	.20	.20	.00	.40	
19	.00	.00	.17	.50	.50	.33	.20	.00	.00	.00	.00	.40	
20	.00	.00	.00	.83	.33	.17	.00	.20	.00	.00	.00	.40	
21	.00	.00	.00	1.00	.17	.67	.20	.00	.20	.00	.00	.40	
22	.00	.17	.00	1.17	.33	.50	.20	.20	.00	.00	.00	.40	
23	.00	.17	.00	.83	.33	.17	.00	.20	.20	.00	.00	.40	
24	.00	.50	.33	1.67	.67	.33	.00	.20	.00	.00	.00	.40	
Total Monthly Incidents of Neg.Pricing	1.00	6.67	9.00	21.33	14.33	8.00	3.20	3.20	1.00	.40	.00	9.40	
Average Monthly Incidents of Neg.Pricing	.08	.53	.72	1.71	1.15	.64	.26	.26	.08	.03	.00	.75	
Annual Adjustment Factor to be applied across 10-year forecast	1.29%	8.60%	11.61%	27.52%	18.49%	10.32%	4.13%	4.13%	1.29%	0.52%	0.00%	12.12%	

XIII.3. Experience, to Date, With Managing Exposure to Negative Market Prices and/or Lessons Learned from Other Retail Sellers in California

SDCP understands the exposure to negative price risk and that it should pay close attention to historical nodal energy prices near areas where prospective renewable generating facilities may

be located. Gathering such information will facilitate an improved understanding of the frequency and significance of instances involving negative pricing and may influence project rankings within SDCP administered solicitation processes. SDCP understands that negative pricing is more prevalent in certain geographic regions throughout the state, so contracting with generating resources located within or adjacent to such areas may expose the organization to higher than expected renewable energy and compliance costs. SDCP is aware that certain contract structures, including “index plus” pricing arrangements, may substantially minimize the financial impacts related to negative pricing. For example, numerous CCAs have pursued the use of index plus pricing structures and, as a result, such contracts are generally insulated from instances involving negative market prices and/or curtailment risk. Another effective mitigation measure for negative price risk is the co-located installation of battery storage infrastructure with intermittent renewable generating capacity. Such infrastructure generally allows the buyer to shift some or all of the renewable energy production away from times of day when negative pricing can be particularly prevalent, allowing for the delivery of such power at times of day when market pricing is higher. SDCP has evaluated contracting with curtailment bid cap arrangements, as well as the inclusion of energy storage infrastructure, to minimize the risk of curtailment and negative pricing. In fact, all of SDCP’s initial long term renewable energy supply contracts for solar generation incorporate the use of battery storage to facilitate the shifting of production curves to better align with customer energy use and market pricing conditions. During its solicitation processes, SDCP will evaluate negative pricing history, as needed, for project opportunities that may expose the organization to such risks.

SDCP is pursuing a diversified portfolio of RPS contracts that seek to utilize a variety of contract structures, generating technologies, resource locations, suppliers, risk allocation mechanisms,

and other considerations.—

~~XIII.4. Direct Costs Incurred, to Date, for Incidences of Overgeneration and Associated Negative Market Prices~~

~~—Based on current supply contracts, SDCP has yet to incur direct costs related to negative pricing (for incidences of overgeneration associated with renewable generating facilities). However, there has been indirect cost related to curtailments of index plus contracts that reduce delivery volumes.—~~

~~XIII.5. An Overall Strategy for Managing the Overall Cost Impact of Increasing Incidences of Overgeneration and Negative Market Prices~~

~~The direct costs associated with incidences of overgeneration are an unfortunate reality. It is the goal of SDCP to minimize these costs wherever possible by investigating mitigation strategies and learning lessons to avoid negative pricing through certain contracting mechanisms and operational strategies. While curtailment is a viable renewable integration strategy that is generally more cost effective than other options, there are potential negative consequences from excessive curtailment. Curtailment of solar and wind represents a lost opportunity to generate zero GHG emitting electricity, and excessive curtailment could impact the ability of the state to meet its environmental and energy policy goals. Additionally, these over-supply situations expose ratepayers to increased costs because their LSEs must either economically curtail the generating resource (and often pay for the electricity that was not generated) or generate power and be exposed to negative prices. Because these conditions are largely driven by state policy, it is appropriate to consider macro level mitigation measures through CAISO initiatives, Commission rulemakings, and possibly even legislation. There are a number of measures and policies that have already been implemented or are currently being pursued that will have significant impacts on curtailment in the future. This includes the expansion of the Energy~~

Imbalance Market, improvements to the CAISO market design, enhanced forecasting capabilities, time of use rates, improved EV charging functionalities, smart deployment of distributed energy resources, and furthered regional integration. The Commission's IRP proceeding will be an appropriate forum to measure the impact of these policies and the effect that they will have on future curtailment. These new measures will need to be modeled and incorporated into forecasts of future curtailment.

XIII.6. Contract Terms Included in RPS Contracts Intended to Reduce the Likelihood of Curtailment or Protect Against Negative Prices.

As described elsewhere in this RPS Procurement Plan, SDCP is aware of potential cost, compliance, and environmental impacts of negative market prices and associated curtailment of renewable resources. SDCP is building its supply portfolio with the intent to limit SDCP's exposure to negative pricing. SDCP has incorporated a number of strategies and relevant contract provisions to further reduce curtailment and negative price risk. Primarily, SDCP has not signed a PPA with a solar-only (i.e. not co-located or hybridized with energy storage) generating facility that exposes SDCP to any market price exposure; instead, SDCP has preferred to contract with solar plus storage hybrid facilities. When contracting for solar or wind output not associated with hybrid or co-located facilities, SDCP has pursued index plus pricing structures or fixed volume contracts to ensure the same protection against negative prices and reductions in deliveries due to curtailment. When contracting with hybrid facilities that result in exposure to market prices, SDCP has maintained full dispatch rights of the facility to ensure that it can shift deliveries from negatively priced intervals and into higher priced periods, both to increase market revenues received and to reduce the magnitude of curtailed renewable generation. SDCP is likely to employ these strategies in future contracting while monitoring, exploring, and evaluating additional techniques to hedge against these potential outcomes.

~~XIII~~**IV. Cost Quantification**

SDCP has updated its Cost Quantification Table, Appendix E, based on current renewable energy supply contracts and has extended the planning period reflected in this appendix through ~~2034~~**2035**. SDCP will continue to update such information in future RPS procurement planning documents when new data points become available.

~~XV. Conformance with the IRP Proceeding~~

~~The resources identified in this RPS Procurement Plan are consistent with resources that were identified in SDCP's most recent IRP, which was approved by SDCP's governing board and provided to the Commission for certification on November 1, 2022, and with SDCP's Updated IRP, which was submitted to the Commission on October 16, 2023. As required by the ACR, SDCP includes the following table that describes how SDCP's 2024 RPS Procurement Plan conforms with the determinations made in the IRP proceedings (R-16-02-007, R-20-05-003 and D-24-02-047). As required, SDCP will highlight the interrelationships of its RPS and IRP planning processes in a future iteration of this RPS Procurement Plan. The following table reflects SDCP's most recent updates, as reflected in its RPS Procurement Plan, regarding RPS alignment with the IRP process.~~

IRP Section Subsection	RPS Alignment in IRP	
III. Study Results A. Preferred and Conforming Portfolios	Retail sellers should explain how the RPS resources they plan to procure, outlined in their RPS Plan, will align with each portfolio to be developed in their IRP. In addition to the list of the IRP portfolios developed and portfolio descriptions submitted for Commission approval and certification in IRP Plans, this should include:	
	1. Existing RPS resources that the retail seller owns or contracts.	As part of its 2022 IRP filing, SDCP submitted two Preferred Conforming Portfolios that achieve its proportional share of both the 30 and 25 MMT GHG targets by 2035. These targets were in addition to the requirements in D-22-02-

	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 in D.21-06-035 and the supplemental procurement ordered in D.23-02-040.	004 which require LSEs to meet their proportional share of the 2030 target of 38 MMT and plan for a 2030 target of 30 MMT. Because SDCP has yet to finalize its initial long-term RPS supply commitments that will contribute to the achievement of such portfolio goals, this document reflects those resources that SDCP intends to contract with in the future. Such procurement efforts are expected to contribute to the achievement of relevant GHG targets as well as RPS procurement requirements, including the 65% long-term contracting requirement. Description of 2022-Conforming Portfolios: ● 30 MMT Conforming Portfolio: Portfolio that achieves SDCP's proportional share of a 30 MMT statewide GHG target. ○ The 30 MMT Conforming Portfolio assumed the use of new RPS resources not yet placed under contract, including: 1,425-MW of new hybrid resources (which would include 750 MW of battery storage to promote grid reliability); 550 MW of new wind resources; and 100 MW of new-geothermal resources. ○ The 30 MMT Conforming Portfolio also assumed the use of existing RPS resources not yet placed under contract, including: 250 MW of existing wind resources. ○ SDCP's 30 MMT portfolio conformed to the procurement timing, resource quantities, and general resource attributes identified in the 30 MMT reference system plan. ● 25 MMT Conforming Portfolio: Portfolio that achieves SDCP's proportional share of a 25 MMT statewide GHG target. ○ The 25 MMT Conforming Portfolio assumed the use of new-
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~~RPS resources not yet placed under contract, including: 1,425-MW of new hybrid resources (which would include 750 MW of battery storage to promote grid reliability); 550 MW of new wind resources; and 100 MW of new geothermal resources.~~

~~○ The 25 MMT Conforming Portfolio also assumed the use of existing RPS resources not yet placed under contract, including: 250 MW of existing wind resources.~~

~~○ SDCP's 25 MMT portfolio conformed to the procurement timing, resource quantities, and general resource attributes identified in the 25 MMT reference system plan.~~

~~Meeting the Mid-Term Reliability obligations from D.21-06-035:~~

~~○ SDCP expects to meet the Mid-Term Reliability ("MTR") cumulative obligations by 2025 via resources that are currently under contract (scheduled to achieve commercial operation in 2024 or 2025) or under negotiation. SDCP's RPS RFO's in Q4 2022 and Q1 2023 targeted resources that could address any outstanding requirements for resources to be online in 2025 or, should they present, in 2023 or 2024. With respect to Long Leadtime obligations for resources to be online in 2026, SDCP closed its solicitation on July 6, 2022 for "clean firm" resources and closed another solicitation for stand-alone storage, including long duration energy storage resources, in Q2 2023. SDCP notes that per D.23-2-040, see below, these long lead-~~

		time obligations are now for resources to be online by 2028. Meeting the Mid-Term Reliability obligations from D.23-02-040: ○ SDCP expects to meet the additional Mid-Term Reliability (“MTR”) obligations for D.23-02-040, via resources that are under negotiation from its 2023 Long-Term RPS RFO-seeking projects with CODs through 2028. Additionally, SDCP is in negotiation with projects from its 2023 Stand-Alone Storage RFO for long-duration storage projects that would be considered long-lead-time resources needed by 2028 under D.23-02-040.
IV. Action Plan A. Proposed Activities	Retail sellers should describe how they propose to use RPS resources to implement their Preferred Portfolio. Narratives should include:	
	1. Proposed RPS procurement activities as required by Commission decision or mandated procurement. 2. Description of RPS resources identified in the Study Results section that correspond to proposed activities. 3. Procurement plans, potential barriers, and resource viability for each new RPS resource identified.	To ensure compliance with its GHG and RPS targets, SDCP plans to substantially rely on GHG-free and RPS-eligible resources while contributing to statewide reliability requirements and responsibly managing overall portfolio costs. This approach is generally consistent between the 30 MMT Conforming Portfolio and 25 MMT Conforming Portfolio in the 2022 IRP Plan. In its IRP, SDCP also established that its planned incremental capacity exceeds its pro-rata share of capacity that may be needed for replacement of Diablo Canyon. These resources are further described in SDCP’s 2022 IRP and, following collaboration with SDG&E to realign MTR procurement obligations and associated procurement and contract administration, SDCP maintains the expectation that its capacity from resources under contract and currently in negotiation will exceed requirements related to replacement of Diablo Canyon. SDCP expects to administer future solicitation processes to fill outstanding resource needs.

	required to meet portfolio specifications reflected in its 30 MMT and 25 MMT Preferred Conforming Portfolios as well as ongoing RPS procurement obligations. As noted elsewhere in this RPS Procurement Plan, SDCP will update the Commission with regard to the outcomes of its current long-term RPS contract negotiations in a future iteration of this planning process. SDCP does not foresee any barriers or viability concerns related to its requisite resource commitments but will advise the Commission if this impression changes over time.		
IV. Action Plan B. Procurement Activities	The retail seller should describe the solicitation strategies for the RPS resources that will be included in their Preferred Portfolio. This description should include: <table border="1"> <tr> <td data-bbox="472 842 776 1241"> <i>1. The type of solicitation.</i> <i>2. The timeline for each solicitation.</i> <i>3. Desired online dates.</i> <i>4. Other relevant procurement planning</i> </td><td data-bbox="776 842 1425 1818"> SDCP may participate in distinct solicitations for different products (for example: specific renewable energy products, generating resources or storage infrastructure), or it may choose to solicit multiple products in the same solicitation. These solicitations will be competitive and may be similar to SDCP's initial long-term RPS solicitation, which was previously described in this RPS Procurement Plan. SDCP will administer future solicitations, as necessary, to promote consistency with the resource development plan identified in the IRP (for purposes of promoting achievement with state-mandated RPS targets as well as SDCP's internal targets). As noted above, SDCP anticipates administering upcoming solicitation activities consistent with the process and timeline described in Section I. During administration of future procurement processes, SDCP will utilize the evaluative and contract management processes (further described above in Section X and elsewhere in this Plan) to promote timely project completion and improve planning certainty. </td></tr> </table>	<i>1. The type of solicitation.</i> <i>2. The timeline for each solicitation.</i> <i>3. Desired online dates.</i> <i>4. Other relevant procurement planning</i>	SDCP may participate in distinct solicitations for different products (for example: specific renewable energy products, generating resources or storage infrastructure), or it may choose to solicit multiple products in the same solicitation. These solicitations will be competitive and may be similar to SDCP's initial long-term RPS solicitation, which was previously described in this RPS Procurement Plan. SDCP will administer future solicitations, as necessary, to promote consistency with the resource development plan identified in the IRP (for purposes of promoting achievement with state-mandated RPS targets as well as SDCP's internal targets). As noted above, SDCP anticipates administering upcoming solicitation activities consistent with the process and timeline described in Section I. During administration of future procurement processes, SDCP will utilize the evaluative and contract management processes (further described above in Section X and elsewhere in this Plan) to promote timely project completion and improve planning certainty.
<i>1. The type of solicitation.</i> <i>2. The timeline for each solicitation.</i> <i>3. Desired online dates.</i> <i>4. Other relevant procurement planning</i>	SDCP may participate in distinct solicitations for different products (for example: specific renewable energy products, generating resources or storage infrastructure), or it may choose to solicit multiple products in the same solicitation. These solicitations will be competitive and may be similar to SDCP's initial long-term RPS solicitation, which was previously described in this RPS Procurement Plan. SDCP will administer future solicitations, as necessary, to promote consistency with the resource development plan identified in the IRP (for purposes of promoting achievement with state-mandated RPS targets as well as SDCP's internal targets). As noted above, SDCP anticipates administering upcoming solicitation activities consistent with the process and timeline described in Section I. During administration of future procurement processes, SDCP will utilize the evaluative and contract management processes (further described above in Section X and elsewhere in this Plan) to promote timely project completion and improve planning certainty.		

IV. Action Plan C. Potential Barriers	Retail sellers should provide a summary of the barriers that will be identified in their Preferred Portfolio as they relate to RPS resources. The section should include:	
	1. Key market, regulatory, financial, or other resource viability barriers or risks associated with the RPS resources coming online in retail sellers' Preferred Portfolios. 2. Key risks associated with the potential retirement of existing RPS resources on which the retail seller intends to rely in the future.	SDCP does not expect any procurement barriers to impede its future contracting for new renewable energy resources, but notes that even though a balanced, diverse RPS portfolio is desirable, the limited resource availability and lead time required for some technology types may necessitate planning flexibility. SDCP also observes that the rigorous demands of California's RPS program, particularly the currently effective 65 percent long term contracting mandate, may necessitate contracting activities with a portfolio of resources that will evolve considerably over time—more specifically, SDCP may need to pursue initial supply commitments with a portfolio of resources that does not exactly reflect its eventual/ideal characteristics related resource diversity and/or reliability. Pursuit of such portfolio characteristics will continue to be a work in progress during SDCP's first several procurement efforts and will evolve throughout the upcoming 10 year planning period. The key risk affecting SDCP's achievement of the 46 MMT and 38 MMT Preferred Conforming IRP Portfolios in the 2020 IRP Plan and the 30 MMT and 25 MMT portfolios in the 2022 IRP Plan is reliance on new resources—while SDCP intends to contract with highly experienced and qualified project developers (when new build resources are deemed necessary), there is always a limited risk of project failure. In consideration of SDCP's existing RPS contract negotiation processes that will support achievement of parameters of the Preferred Conforming IRP Portfolios, it does not have any substantive concerns regarding its ability to fulfill and achieve levels of renewable energy procurement that will be required to satisfy pertinent RPS mandates or IRP targets. If such concerns happen to change in the future, SDCP

		will accordingly notify the Commission in a subsequent iteration of this planning process.
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XIV. Impact of Transmission and Interconnection Delays

SB 1174 (stats. 2022, ch. 229) requires electrical corporations that own transmission lines to report to the Commission on the development of transmission and interconnection facilities necessary to provide transmission deliverability for renewable energy and/or energy storage facilities that have executed interconnection agreements. SDCP is not subject to the requirements of SB 1174 and does not own any transmission lines. Accordingly, SDCP has not included a Transmission/Interconnection Delay Data Report as an attachment to this RPS Procurement Plan. However, SDCP has contracts with RPS-eligible projects in development that are dependent on transmission line upgrades, and ~~upgrades, and upgrades and~~ urges the IOUs and the Commission to prioritize network upgrades to avoid any further delays to renewable energy facility construction.

Dated: June 30, 2025~~July 23, 2024~~

Respectfully submitted,

/s/ Karin Burns

Karin Burns
Chief Executive Officer
San Diego Community Power
P.O. Box 12716
San Diego, CA 92101
(619) 657-0060
kburns@sdcommunitypower.org

Appendix B

Draft 2025 RPS Plan Procurement Plan Checklist and Verification

Draft 2025 RPS Procurement Plan Checklist – Task Completed

Retail Seller Name: San Diego Community Power	YES/NO	NOTES
I. Summary of Major Changes to RPS Plan	YES	
II. Executive Summary Key Issues	YES	
III. Compliance with Recent Legislation and Impact of Regulatory Changes	YES	
IV. Assessment of RPS Portfolio Supplies and Demand	YES	
IV.A Portfolio Supply and Demand	YES	
IV.A.1 Long-term Procurement	YES	
IV.B Portfolio Diversity and Reliability	YES	
IV.B.1 Forecasting for Increased Transportation Electrification	YES	
IV.B.2 Curtailment Frequency, Cost, and Forecasting	YES	
IV.C Portfolio Optimization	YES	
IV.C.1 Conformance with the IRP Proceeding	YES	
IV.C.2 Response to Local and Regional Policies	YES	
IV.D Lessons Learned – Assessment of RPS Portfolio Supplies and Demand	YES	
V. Project Development Status Update	YES	
VI. Potential Compliance Delays	YES	
VII. Risk Assessment	YES	
VII.A Compliance Risk	YES	
VII.B Risk Modeling and Risk Factors	YES	
VII.C Lessons Learned – Risk Assessment	YES	
VIII. Renewable Net Short Calculations	YES	
IX. Minimum Margin of Procurement (MMoP)	YES	
IX.A MMoP Level	YES	
IX.A.1 MMoP Methodology and Inputs	YES	
IX.A.2 MMoP Scenarios	YES	
X. Bid Solicitation Protocol	YES	
X.A Bid Selection Protocols	YES	
X.B Solicitation Protocols for Renewables Sales	YES	
X.C Least-Cost Best-Fit (LCBF) Criteria	YES	
XI. Safety Considerations	YES	
XII. Consideration of Price Adjustments	YES	
XIII. Cost Quantification	YES	
XIV. Impact of Transmission and Interconnection	YES	
XV. Appendix A: Redlined Version of the Draft	YES	

Officer Verification

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 June 30, 2025, in San Diego, California.


Karin Burns (Jun 25, 2025 17:09 PDT)

Karin Burns
Chief Executive Officer
San Diego Community Power
PO Box 12716
San Diego, CA 92112
(619) 657-0060
kburns@sdcommunitypower.org

Appendix C

Renewable Net Short Calculation

LSE Name:	San Diego Community Power (SDCP)	Input required	No input required	Hard-coded
Date Filed:	June 30, 2025			

Variable	Calculation	Item	2021 Actual	2022 Actual	2023 Actual	2024 Actual	2021-2024	2025 Forecast	2026 Forecast	2027 Forecast	2025-2027
		Forecast Year					CP 4	1	2	3	CP 5
		Annual RPS Requirement									
A		Total Retail Sales (MWh)	2,047,877	5,624,296	7,375,894	7,724,904	22,772,970				
B		RPS Procurement Quantity Requirement (%)	35.8%	38.5%	41.3%	44.0%	41.0%	46.7%	49.3%	52.0%	49.4%
C	A*B	Gross RPS Procurement Quantity Requirement (MWh)	732,116	2,165,354	3,042,556	3,398,958	9,338,984				
D		Voluntary Margin of Over-procurement (MWh)	449,792	1,116,697	977,573	617,992	3,162,054				
E	C+D	Net RPS Procurement Need (MWh)	1,181,908	3,282,051	4,020,129	4,016,950	12,501,038				
		RPS-Eligible Procurement									
Fa		Risk-Adjusted RECs from Online Generation (MWh)	1,180,000	3,334,318	4,333,891	5,134,533	13,982,742				
Faa		Forecast Failure Rate for Online Generation (%)					#DIV/0!	2.0%	2.0%	2.0%	2%
Fb		Risk-Adjusted RECs from RPS Facilities in Development (MWh)				0					
Fbb		Forecast Failure Rate for RPS Facilities in Development (%)					#DIV/0!	27.0%	27.0%	27.0%	27%
Fc		Pre-Approved Generic RECs (MWh)				0					
Fd		Executed REC Sales (MWh)				435,000	435,000				
F	Fa+Fb+Fc-Fd	Total RPS Eligible Procurement (MWh)	1,180,000	3,334,318	4,333,891	4,699,533	13,547,742				
F0		Category 0 RECs			516,450	549,533	1,065,983				
F1		Category 1 RECs	1,005,000	2,849,318	3,452,079	4,060,952	11,367,349				
F2		Category 2 RECs	175,000	484,989	365,362	89,048	1,114,399				
F3		Category 3 RECs				0					
		Gross RPS Position (Physical Net Short)									
Ga	F-E	Annual Gross RPS Position (MWh)	(1,908)	52,267	313,762	682,583	1,046,704				
Gb	F/A	Annual Gross RPS Position (%)	58%	59%	59%	61%	59%				
		Net RPS Position (Optimized Net Short)									
La	Ga+Ia-Ib-Hc	Annual Net RPS Position after Bank Optimization (MWh)	(1,908)	52,267	313,762	682,583	1,046,704				
Lb	(F+Ia-Ib-Hc)/A	Annual Net RPS Position after Bank Optimization (%)	58%	59%	59%	61%	59%				

Note: All values are to be input in MWhs

*D.17-11-037 provides for utilities serving load in areas outside California Independent System Operator Balancing Authority (Non-CBA Utilities) to bank excess bundled PCC3 RECs

2028 Forecast	2029 Forecast	2030 Forecast	2028-2030	2031 Forecast	2032 Forecast	2033 Forecast	2031-2033	2034 Forecast	2035 Forecast
4	5	6	CP 6	7	8	9	CP 7	10	11
8,062,276	8,102,589	8,143,102	24,307,970	8,183,818	8,224,787	8,265,561	24,674,416	8,307,190	8,348,726
54.7%	57.3%	60.0%	57.3%	60.0%	60.0%	60.0%	60.0%	60.0%	60.0%
4,407,647	4,645,215	4,885,861	13,938,723	4,918,291	4,934,542	4,959,516	14,904,649	4,984,314	5,009,236
1,907,535	1,972,170	2,035,776	5,915,481	2,291,469	2,549,668	2,810,393	7,651,530	3,073,660	3,339,490
6,315,182	6,617,385	6,921,637	19,554,204	7,201,760	7,484,511	7,769,909	22,456,180	8,057,974	8,348,726
4,751,690	4,742,800	5,015,883	14,508,373	5,008,975	4,837,471	4,609,828	14,456,274	1,963,815	1,996,435
2.0%	2.0%	2%	2%	2.0%	2.0%	2.0%	2%	2.0%	2.0%
2,478,026	3,532,355	3,536,067	9,566,449	3,519,854	3,500,179	3,481,798	10,501,931	3,465,796	3,449,861
27.0%	27.0%	27.0%	27%	27.0%	27.0%	27.0%	27%	27.0%	27.0%
720,000	720,000	996,000	2,436,000	996,000	996,000	996,000	2968000	996,000	996,000
6,509,717	7,575,155	7,553,951	21,638,522	7,532,829	7,341,650	7,095,626	21,970,106	4,433,611	4,390,296
550,172	550,172	550,172	1,650,516	550,172	550,172	466,757	1,567,101	-	-
5,959,545	7,024,983	7,003,778	19,988,306	6,982,657	6,791,478	6,628,869	20,403,004	4,433,611	3,892,296
-	-	-	0	-	-	-	0	-	-
194,534	957,770	632,313	1,784,618	331,069	(142,860)	(674,283)	(486,074)	(3,624,363)	(3,958,430)
81%	93%	93%	89%	92%	89%	86%	89%	53%	53%
194,534	957,770	632,313	1,784,618	331,069	(142,860)	(674,283)	(486,074)	(3,624,363)	(3,958,430)
81%	93%	93%	89%	92%	89%	86%	89%	53%	53%

Appendix D

Project Development Status Update

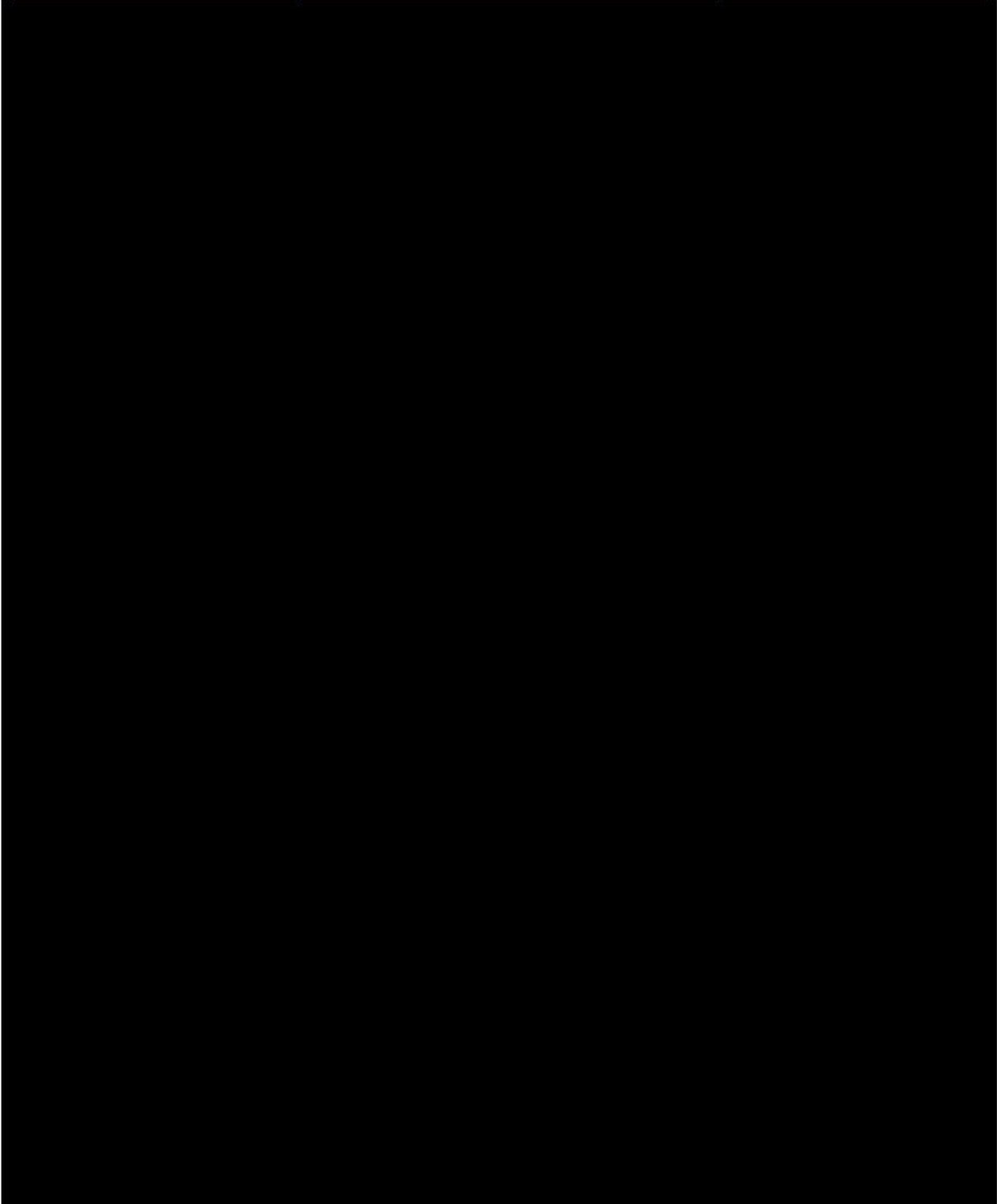
Reporting LSE Name	RPS Contract ID	Project Name	Technology Type
San Diego Community Power (SDCP)	SDCP50003	Viking Energy Farm, LLC	Solar PV +BESS
San Diego Community Power (SDCP)	SDCP50005	IP Oberon, LLC	Solar PV
San Diego Community Power (SDCP)	SDCP50004	JVR Energy Park, LLC	Solar PV +BESS
San Diego Community Power (SDCP)	SDCP50006	ORNI 30 LLC	Solar PV + BESS
San Diego Community Power (SDCP)	SDCP50007	Yellow Pine Solar III, LLC	Solar PV + BESS
San Diego Community Power (SDCP)	SDCP60001	Duran Mesa LLC	Wind
San Diego Community Power (SDCP)	SDCP50008	Vidal Solar	Solar PV + BESS
San Diego Community Power (SDCP)	SDCP60002	Sunzia	Solar PV + BESS
San Diego Community Power (SDCP)	SDCP50009	Pelicans Jaw	Solar PV + BESS
San Diego Community Power (SDCP)	SDCP50010	Purple Sage	Solar PV + BESS
San Diego Community Power (SDCP)	SDCP50011	Luminia CVC	Solar PV - Rooftop
San Diego Community Power (SDCP)	SDCP50012	Luninia Fairve I	Solar PV - Rooftop
San Diego Community Power (SDCP)	SDCP50013	Luminia Fairve II	Solar PV - Rooftop
San Diego Community Power (SDCP)	SDCP50014	Luminia Mesamint	Solar PV - Rooftop
San Diego Community Power (SDCP)	SDCP50015	Luminia Harvest	Solar PV - Rooftop

Project Development Phase	City	County	State	Zip Code	Latitude
Online	Holtville	Imperial	CA	92250	32.8034
Online	Desert Center	Riverside	CA	92239	33.7181
Pre-Construction	Jacumba Hot Springs	San Diego	CA	91934	32.6242
Construction	Brawley	Imperial	CA	92227	33.02003056
Pre-Construction	Pahrump	Clark	NV	98061	36.067942
Post-Construction	Duran	Torrance	NM	88301	34.232635
Construction	Vidal	San Bernardino	CA	92280	34.092518
Construction	Multiple	Torrance, Lincoln, San Miguel	NM	Multiple	Multiple
Construction	Lost Hills	Kern	CA	93249	35.861973
Pre-Construction	Pahrump	Clark	NV	89124	36.028883
Pre-Construction	Chula Vista	San Diego	CA	91910	32.629583
Pre-Construction	Chula Vista	San Diego	CA	91911	32.592253
Pre-Construction	Chula Vista	San Diego	CA	91911	32.592282
Pre-Construction	San Diego	San Diego	CA	92127	33.016632
Pre-Construction	San Diego	San Diego	CA	92154	32.56896

Longitude	Contract Length (Years)	Contract Execution Date (mm/dd/yyyy)	Contract Start Date (mm/dd/yyyy)
-115.2702	20	5/3/2021	9/1/2024
-115.3426	15	6/11/2021	7/7/2023
-116.1748	20		
-115.5118361	20		
-115.780358	20		
-105.293188	10		
-114.467716	20		
Multiple	15		
-119.468825	15		
-115.836632	20		
-117.086121	20		
-117.069448	20		
-117.071005	20		
-117.106306	20		
-116.946631	20		

Contract End Date (mm/dd/yyyy)	Contract Capacity	Expected Annual Generation
8/30/2044	136.8	345,000
7/3/2038	75	230,000
	90	
	42	
	35	
	50	
	160	
	150	
	440	
	400	
	1.75	
	0.52	
	0.52	
	1.18	
	1.52	

Total Contract Volume	Commercial Operation Date (COD)	Transmission Status
6,638,597	6/10/2024	LGIA Executed in Dec 2021
3,347,242	7/7/2023	LGIA executed in April 2021



Storage: Rated Power (MW)	Storage: Capacity (MWh)	Project Notes
145.5	582	
0	0	50% of facility
70	280	
35	140	
35	140	
160	640	
0	0	
238.5	954	
400	1600	

Appendix E

Cost Quantification

L&E Name: San Diego Community Power (SDCP)
Date Filed:

Input Required

No Input Required

Table 1 Cost Quantification (Actual Net Costs, \$)		Actual RPS-Eligible Procurement and Generation Net Costs (\$)			
1	Executed RPS-Eligible Contracts by Technology Type* (Purchases and Sales)**	T1 2022	T1 2023	T1 2024	
2	BioGen Digester Gas				
3	BioGen Landfill Gas		\$ 575,185		
4	Biodiesel				
5	Biomass	\$ 108,292	\$ 44,543,020	\$ 29,053,794	
6	Municipal Solid Waste				
7	Geothermal		\$ 4,328,978		
8	Small Hydro (Non-UG)		\$ 3,408,441		
9	Conduit Hydro				
10	Water Supply / Conveyance				
11	Ocean Wave				
12	Ocean Thermal				
13	Total Current				
14	Solar PV (Non-UG)	\$ -	\$ 234,735,480	\$ 27,930,536	
15	Solar Thermal				
16	Wind	\$ 5,307,750	\$ 168,643,568	\$ 10,377,339	
17	Unbundled RECs (REC Only)				
18	Verizon (Index Plus REC)***	\$ 43,847,405		\$ 318,830,247	
19	Fuel Cell				
20	Linear Generator				
21	UGO: Small Hydro				
22	UGO: Solar PV				
23	UGO: Other				
24	Executed REC Sales (Revenue)	\$ 2,121,900		\$ 31,778,800	
25	Total RPS-Eligible Procurement and Generation Net Cost	\$ 48,127,647	\$ 435,838,799	\$ 386,293,116.61	
26	Total Retail Sales (MWh)	5,624,298	7,375,204	7,724,304	
27	Incremental Rate Impact	8.302547467	6.310316982	6.117120874	

Table 2 Cost Quantification (Forecast Costs and Revenues, \$)		Forecast RPS-Eligible Procurement Costs and Revenues (\$)										
1	Executed But Not Approved RPS-Eligible Contracts (Purchases and Sales)**	T2 2025 EBNA	T2 2026 EBNA	T2 2027 EBNA	T2 2028 EBNA	T2 2029 EBNA	T2 2030 EBNA	T2 2031 EBNA	T2 2032 EBNA	T2 2033 EBNA	T2 2034 EBNA	T2 2035 EBNA
2	BioGen Digester Gas											
3	BioGen Landfill Gas											
4	Biodiesel											
5	Biomass											
6	Municipal Solid Waste											
7	Geothermal											
8	Small Hydro (Non-UG)											
9	Conduit Hydro											
10	Water Supply / Conveyance											
11	Ocean Wave											
12	Ocean Thermal											
13	Total Current											
14	Solar PV (Non-UG)											
15	Solar Thermal											
16	Wind											
17	Unbundled RECs (REC Only)											
18	Verizon (Index Plus REC)***											
19	Fuel Cell											
20	Linear Generator											
21	UGO: Small Hydro											
22	UGO: Solar PV											
23	UGO: Other											
24	Executed REC Sales (Revenue)											
25	Total Executed But Not Approved RPS-Eligible Procurement and Generation Cost				0	0	0	0	0	0	0	0
26	Total Retail Sales (MWh)				8,062,278	8,102,589	8,143,102	8,183,618	8,224,737	8,265,861	8,307,130	8,348,728
27	Incremental Rate Impact				0	0	0	0	0	0	0	0
28	Executed RPS-Eligible Contracts (Purchases and Sales)**	T2 2025 EAA	T2 2026 EAA	T2 2027 EAA	T2 2028 EAA	T2 2029 EAA	T2 2030 EAA	T2 2031 EAA	T2 2032 EAA	T2 2033 EAA	T2 2034 EAA	T2 2035 EAA
29	BioGen Digester Gas											
30	BioGen Landfill Gas											
31	Biodiesel											
32	Biomass											
33	Municipal Solid Waste											
34	Geothermal											
35	Small Hydro (Non-UG)											
36	Conduit Hydro											
37	Water Supply / Conveyance											
38	Ocean Wave											
39	Ocean Thermal											
40	Total Current											
41	Solar PV (Non-UG)				\$ 128,019,072	\$ 172,122,112	\$ 171,535,218	\$ 170,952,488	\$ 170,230,909	\$ 169,558,727	\$ 168,987,630	\$ 168,420,233
42	Solar Thermal											
43	Wind				\$ 69,182,167	\$ 69,467,250	\$ 69,755,184	\$ 70,045,987	\$ 70,340,302	\$ 70,636,367	\$ 70,934,829	\$ 71,235,829
44	Unbundled RECs (REC Only)											
45	Verizon (Index Plus REC)***				\$ 251,955,560	\$ 253,422,003	\$ 254,968,416	\$ 256,589,599	\$ 258,236,871	\$ 260,089,247	\$ 262,034,587	\$ 264,014,156
46	Fuel Cell											
47	Linear Generator											
48	UGO: Small Hydro											
49	UGO: Solar PV											
50	UGO: Other											
51	Executed REC Sales (Revenue)											
52	Total Executed and Approved RPS-Eligible Procurement and Generation Cost	\$ 448,138,799	\$ 496,911,365	\$ 498,268,918	\$ 497,808,204	\$ 498,513,876	\$ 497,391,341	\$ 497,291,341	\$ 497,291,341	\$ 497,291,341	\$ 497,291,341	\$ 497,291,341
53	Total Retail Sales (MWh)	8,062,278	8,102,589	8,143,102	8,183,618	8,224,737	8,265,861	8,307,130	8,348,728	8,390,326	8,431,924	8,473,522
54	Incremental Rate Impact	8.27084231	8.10203039	8.00469174	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007
55	Total RPS-Eligible Procurement and Generation Cost	\$ 448,138,799	\$ 496,911,365	\$ 498,268,918	\$ 497,808,204	\$ 498,513,876	\$ 497,391,341	\$ 497,291,341	\$ 497,291,341	\$ 497,291,341	\$ 497,291,341	\$ 497,291,341
56	Total Incremental Rate Impact	8.27084231	8.10203039	8.00469174	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007	8.00146007

*Note: Technology definitions are given in the PGC Classification Handbook located in the RPS Compliance Reporting section of: <https://www.cpuc.ca.gov/rpscompliance/reporting/>
**Note: For contracts that have been executed but still require formal approval (CPUC or other formal approval process) for purchases and sales.
***Note: The "Verizon" technology type is to be used in the case of contracts encompassing multiple facilities where the generation type is not yet known.
****Note: For COGs and SMUGs include all executed contracts that require CPUC approval. For COGs and COGs include all executed contracts that have been approved through relevant formal approval processes.

LSE Name: San Diego Community Power
 Date Filed: June 30, 2025

Input Required

No Input Required

Table 3 Cost Quantification (Actual Procurement / Generation and Sales, MWh)		Actual RPS-Eligible Procurement / Generation and Sales (MWh)		
1	Technology Type ¹ (Procurement / Generation and Sales)	T3 2022	T3 2023	T3 2024
2	Biogas: Digester Gas			
3	Biogas: Landfill Gas		4,662	
4	Bioreact			
5	Biomass	9,756	496,895	513,260
6	Municipal Solid Waste			
7	Geothermal		46,091	
8	Small Hydro (Non-UCG)		33,607	
9	Conduff Hydro			
10	Water Supply / Conveyance			
11	Ocean Wave			
12	Ocean Thermal			
13	Tidal Current			
14	Solar PV (Non-UCG)		2,133,286	459,409
15	Solar Thermal			
16	Wind	255,403	1,619,350	170,763
17	Unbundled REC's (REC Only)			
18	Various (Index Plus REC) ²	3,207,159		3,991,101
19	Fuel Cell			
20	Linear Generator			
21	UCG: Small Hydro			
22	UCG: Solar PV			
23	UCG: Other			
24	Executed REC Sales (MWh)	138,000		435,000
25	Total RPS-Eligible Procurement (MWh)	3,394,318	4,333,891	4,699,533

Table 4 Cost Quantification (Forecast Procurement / Generation and Sales, MWh)		Forecast RPS-Eligible Procurement / Generation and Sales (MWh)										
1	Executed But Not Approved RPS-Eligible Contracts (Purchases and Sales) ***	T4 2025 EBNA	T4 2026 EBNA	T4 2027 EBNA	T4 2028 EBNA	T4 2029 EBNA	T4 2030 EBNA	T4 2031 EBNA	T4 2032 EBNA	T4 2033 EBNA	T4 2034 EBNA	T4 2035 EBNA
2	Biogas: Digester Gas											
3	Biogas: Landfill Gas											
4	Bioreact											
5	Biomass											
6	Muni Solid Waste											
7	Geothermal											
8	Small Hydro (Non-UOG)											
9	Conduff Hydro											
10	Water Supply / Conveyance											
11	Ocean Wave											
12	Ocean Thermal											
13	Tidal Current											
14	Solar PV (Non-UOG)											
15	Solar Thermal											
16	Wind											
17	Unbundled REC's (REC Only)											
18	Various (Index Plus REC)***											
19	Fuel Cell											
20	Linear Generator											
21	UOG: Small Hydro											
22	UOG: Solar PV											
23	UOG: Other											
24	Executed REC Sales (MWh)											
25	Total Executed But Not Approved RPS-Eligible Procurement				0	0	0	0	0	0	0	0
26	Executed and Approved RPS-Eligible Contracts (Purchases and Sales) ***	T4 2025 EAA	T4 2026 EAA	T4 2027 EAA	T4 2028 EAA	T4 2029 EAA	T4 2030 EAA	T4 2031 EAA	T4 2032 EAA	T4 2033 EAA	T4 2034 EAA	T4 2035 EAA
27	Biogas: Digester Gas											
28	Biogas: Landfill Gas											
29	Bioreact											
30	Biomass											
31	Biomass											
32	Muni Solid Waste											
33	Geothermal											
34	Small Hydro (Non-UOG)											
35	Conduff Hydro											
36	Water Supply / Conveyance											
37	Ocean Wave											
38	Ocean Thermal											
39	Tidal Current											
40	Solar PV (Non-UOG)				2,680,992	3,748,635	3,728,650	3,708,755	3,685,391	3,663,379	3,643,737	3,624,176
41	Solar Thermal											
42	Wind				956,347	956,347	956,347	956,347	789,243	716,075	461,669	461,669
43	Unbundled REC's (REC Only)											
44	Various (Index Plus REC)***				2,872,377	2,870,173	2,868,953	2,867,726	2,867,016	2,716,172	328,204	304,450
45	Fuel Cell											
46	Linear Generator											
47	UOG: Small Hydro											
48	UOG: Solar PV											
49	UOG: Other											
50	Executed REC Sales (MWh)											
51	Total Executed and Approved RPS-Eligible Procurement				6,509,718.61	7,575,156.34	7,563,960.57	7,532,826.04	7,341,650.41	7,066,626.17	4,433,611.08	4,390,296.34
52	Total RPS Eligible Procurement (MWh)				6,509,718.61	7,575,156.34	7,563,960.57	7,532,826.04	7,341,650.41	7,066,626.17	4,433,611.08	4,390,296.34

¹Note: Technology definitions are given in the POC Classification Handbook located in the RPS Compliance Reporting section of: <https://www.cpuc.ca.gov/RPS/compliance/reporting/>

²Note: For contracts that have been executed but still require formal approval (CPUC or other formal approval process) for purchases and sales.

³Note: The "Various" technology type is to be used in the case of contracts encompassing multiple facilities where the generation type is not yet known.

⁴Note: For IOUs and SMUs: Include all executed contracts that required CPUC approval. For CCAs and ESBPs: Include all executed contracts that have been approved through relevant formal approval processes.