

**REGULATORY UPDATE FOR FEBRUARY 25, 2026
(FEBRUARY 18, 2026 – FEBRUARY 24, 2026)**

I. STATE REGULATORY AGENCIES

CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)¹

Proposed Decisions (PD) and Resolutions

None to report.

Voting Meeting

The CPUC will hold a voting meeting in Santa Maria, California, on Thursday, February 26, 2026, at 11:00 a.m. PT. The energy-related items on the [agenda](#) are below:

Item 2. Res G-3617. This Resolution addresses Southwest Gas Corporation AL 1338-G, filed on July 29, 2025, which requests Commission approval of one biomethane procurement contract pursuant to the Renewable Gas Standard, as established in D.22-02-025.

Item 4. A.21-06-021 (Application of PG&E for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2023). This decision closes this proceeding, finding that submission of additional evidence of PG&E energization costs to be tracked in its Electric Capacity New Business Interim Memorandum Account was achieved in Rulemaking (R.) 24-01-018 and that any unresolved D.24-07-008 issues can be appropriately addressed in R.24-01-018.

Item 7. Res E-5446. This Resolution approves two SDG&E mid-term reliability (MTR) contracts for a total of 92 MW of nameplate capacity. The contracts are for two power purchase tolling agreements for stand-alone battery storage systems, procured as a result of SDG&E's Tranche 3 request for offer. Specifically, the approved contracts include a 44 MW, four-hour battery energy storage system and a 48 MW eight-hour battery energy storage system. According to the Resolution, SDG&E procured these resources to help meet its MTR requirements. This Resolution approves the requested relief in AL 4755-E and AL 4755-E-A.

Item 8. R.10-05-004 (Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues). This decision denies the Petition for Modification (PFM) of D.11-09-015 filed by Bloom Energy Corp. The PFM seeks to increase the 25% annual export cap applicable to projects receiving Self-Generation Incentive Program funds. The decision finds that the PFM provides an insufficient justification for why it could not have been filed

¹ Per CPUC Rules of Practice and Procedure Rule 14.3, comments on proposed decisions are due 20 days after issuance of the proposed decision, and reply comments are due five days thereafter. Comments on draft resolutions are due 20 days after the draft resolution appears in the CPUC's daily calendar, per Rule 14.5.

within one year of the effective date of D.11-09-015 as required by Rule 16.4(d) of the Commission's Rules of Practice and Procedure.

Item 14. Res E-5434. This Resolution approves PG&E's request, with modifications, in AL 7378-E Request for Extension of Time for Phase I and 7378-E-A Modification to Phase II Scope regarding Pilot #3, the Vehicle-to-Everything (V2X) Microgrid Pilot. This Resolution grants PG&E an extension of time for Phase I until June 30, 2026, to complete demonstration activities and data collection. This Resolution also approves PG&E's modification of Phase II to a Hybrid Support Model. Under this model, PG&E will close new participant enrollment, return customer incentives to ratepayers, and provide technical consulting support for V2X readiness at Microgrid Incentive Program sites using non-pilot resources.

Item 40. R.25-06-019 (Order Instituting Rulemaking to Continue Oversight of Electric Integrated Resource Planning and Procurement Processes). This decision requires load-serving entities under the Commission integrated resource planning purview to undertake additional reliability procurement between 2029 and 2032, to pursue any viable projects that can still qualify for Federal tax credits or other incentives, as well as to continue the momentum of annual procurement activity that began under the MTR and supplemental MTR requirements in D.21-06-035 and D.23-02-040, respectively. The new procurement required is 2,000 MW of net qualifying capacity (NQC) by 2030, another 2,000 MW NQC, by 2031, and an additional 2,000 MW NQC by 2032. This procurement will be generally subject to the same eligibility, compliance and enforcement requirements as the prior MTR orders, including D.25-09-007 provisions and consideration of "good faith efforts" to procure, as described in D.21-06-035. In addition, at least one-quarter of the procurement by no later than June 1, 2032 is required to come from resources that have attributes that align with clean firm resources (with capacity factors of at least 80 percent and not use-limited) and/or long-duration storage resources (able to discharge for at least eight hours or more).

Item 41. Investigation (I.) 23-03-008 (Order Instituting Investigation on the Commission's Own Motion into Natural Gas Prices During Winter 2022-2023 and Resulting Impacts to Energy Markets). This decision determines that the following factors contributed to the 2022-2023 gas price spike: (1) prolonged below-normal temperatures and high precipitation levels; (2) interstate pipeline constraints; (3) reduced natural gas flows from the Permian Basin, Canada, and the Rocky Mountain region; (4) reduced natural gas storage supplies; and (5) events occurring before and during bidweek.

Upcoming Workshops and Events

Workshop on Gas Research, Development, and Demonstration (RD&D) Programs. In partnership with the California Energy Commission, PG&E and SoCalGas will host a workshop on February 27, 2026 to present the results from prior RD&D activities and to solicit public input on proposed research directions and investment planning. The event will be held remotely, via Zoom, and registration details are available [here](#).

CALIFORNIA ENERGY COMMISSION (CEC)

Joint Agency Workshop on 2025 Senate Bill (SB) 100 Results

On February 19, 2026, the CEC, CPUC, and California Air Resources Board hosted a joint two-part workshop to present and discuss the draft electricity resource modeling results and implementation challenges for the SB 100 Joint Agency Report. Written comments are due by 5:00 p.m. PT on March 5, 2026.

Staff Workshop on Draft Guidelines for the Demand Side Grid Support (DSGS) Program

The CEC staff workshop previously scheduled for Thursday, February 19, 2026 at 1:30 p.m. PT to discuss proposed changes that have been incorporated into the draft DSGS Program Guidelines, Fifth Edition, was rescheduled for Tuesday, February 24, 2026, from 1:30 p.m. to 4:00 p.m. PT. A copy of the draft guidelines along with the [revised meeting notice](#) and agenda are available on Docket No. 22-RENEW-01, [here](#). Due to the change in workshop date, written comments are now due by 5:00 p.m. PT on March 6, 2026.

Pre-Application Workshop Announced for National Electric Vehicle Infrastructure (NEVI) – 5th Solicitation

The CEC hosted a pre-application workshop on Wednesday, February 25, 2026, at 9:30 a.m. PT regarding California’s solicitation 5 (South) for funding under the NEVI Formula Program. A workshop for solicitation 6 (community charging) will be [held](#) on March 11, 2026 at 9:30a.m. PT. Participation in the workshop is “optional but encouraged” and registration details are available [here](#).

CEC Business Meetings

The next CEC Business Meeting is scheduled for March 12, 2026. The agenda and supporting materials will be available [here](#) ten days prior to the meeting.

MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)

At its February 26, 2026, agenda meeting, the MPUC will consider: (1) adoption of the Administrative Law Judge’s (ALJ) findings of fact, conclusions of law, and recommendations regarding Castle Rock Solar LLC’s application for a site permit for up to 150 MW Castle Rock Solar Project in Dakota County, Minnesota, including issuance of the site permit itself (Docket No. IP7137/GS-24-267); (2) approval of Minnesota Power’s recovery of investments and expenditures in the Longspur Wind Project through the Renewable Resources Rider (Docket No. E015/M-25-309); (3) adoption of the ALJ report and granting of the route permit for Great River Energy and Minnesota Valley Electric Co-op’s 115 kV Laketown Transmission Line and Associated Facilities Project in Carver County, Minnesota (Docket No. ET2/TL-24-132); (4) approval of the Power Purchase Agreements (PPAs) submitted in Xcel Energy’s Petition for Approval of a Solar and Storage Portfolio, and allowance for the company to recover the Minnesota portion of PPA costs from retail customers through the Fuel Clause Rider, approval of

the acquisition and construction of self-build projects and their cost recovery through the Renewable Energy Standard Rider, approval of the acquisition land rights for the Sherco Solar 4 project, limitation of cost recovery for the self-build projects to a symmetrical capital cost cap set at bid cost, and allowance for Xcel Energy to propose changes to its jurisdictional allocation approach in future RES Rider filings (Docket No. E002/M-24-230); and (5) adoption of generic standards for the Distribution System Reactive Upgrades Process (Docket No. E002, 015, 017/CI-24-288).

Additionally, Xcel Energy and Google announced their partnership to construct a data center in Pine Island, Minnesota. As part of the agreement, the companies will partner to bring 1,900 megawatts of new clean energy to the grid, where Google will cover any new grid infrastructure costs associated with the project. A Clean Energy Accelerator Charge will provide for 1,400 MW of wind, 200 MW of solar and 300 MW of long-duration energy storage, along with a \$50 million investment towards Xcel Energy's Capacity*Connect Program. The company states additional generation will help advance Xcel Energy beyond its current energy mix of 70% carbon-free electricity. Xcel Energy's press release is [here](#).

PACIFIC NORTHWEST (OPUC, WUTC, BPA)

Oregon Public Utility Commission (OPUC)

The Oregon Department of Land Conservation and Development released a draft offshore wind energy road map, which will provide lawmakers with recommendations on how to proceed with offshore wind endeavors. The report considers four scenarios: large-scale offshore wind development, pilot projects, economic participation without wind turbines, or opting out of wind development. The report is [here](#).

Washington Utilities and Transportation Commission (WUTC)

On February 26, 2026, the WUTC will hold an open meeting to consider, in relevant part, PacifiCorp's Petition for Account Order to approve deferral of independent evaluator costs for the 2025 Washington-situs Request for Proposals (UE-250904).

The Washington legislature continues to consider a pair of bills, SB 6171 and House Bill (HB) 2515, that would require Emerging Large Energy Use Facilities (ELEUFs) to purchase their energy and pay for needed infrastructure through new tariffs or contracts developed by the state's utilities. Under the bills, starting in 2031, ELEUFs commencing operation after July 1, 2026, must certify to the state that 80% of their energy used to serve their load came from renewable or non-emitting resources, and that they purchased the electricity and renewable energy certificates to substantiate that certification in a "single transaction." The laws require ELEUFs to serve their load using 100% renewable or non-emitting resources beginning in 2036. There has been no movement on SB 6171 in the Senate. However, following the Washington House's public hearing on February 20, 2026, of HB 2515, the bill was scheduled for executive session on February 24, 2026, in the Senate Committee on Environment, Energy & Technology on February 24, 2026.

II. FEDERAL ENERGY REGULATORY COMMISSION (FERC)

February 2026 Commission Meeting

FERC held its [February 2026 Commission meeting](#) on February 19, 2026, which covered administrative, electric, gas, and hydro matters on its docket, including the below.

Order on Qualifying Facility Recertification Delays

FERC issued an order in [Branch Street Solar Partners, LLC](#), addressing a rehearing and clarification request filed by several solar qualifying facilities (QFs) whose owners had failed to timely recertify their facilities after changes in ownership. FERC determined that because the QF recertifications for these projects did not occur until months or years after the ownership changes, the facilities' prior QF certifications "may no longer be relied upon," and therefore FERC no longer considered the companies to be QFs during the interim period, triggering refunds for violating federal law. More on this order may be found on our client alert [here](#).

Order Rescinding Western Electricity Coordinating Council (WECC) Soft Price Cap

FERC [rescinded](#) the WECC soft price cap, previously set at \$1,000/MWh and which it had implemented in response to the 2000-2001 Western Energy Crisis, for bilateral spot market energy sales, effective July 18, 2025. This decision followed a 2024 D.C. Circuit ruling that FERC must apply the *Mobile-Sierra* public-interest standard before ordering refunds for above-cap sales, which significantly limited the cap's practical function. Following the D.C. Circuit's ruling, FERC investigated, pursuant to section 206 of the Federal Power Act (FPA), whether the cap remained just and reasonable. After reviewing comments, FERC determined that the cap had become unnecessary due to major developments in Western energy markets, including the growth of organized markets such as the Extended Day-Ahead Market and RTO West, along with FERC's expanded legal authority, enhanced monitoring tools, and more robust market oversight since the early 2000s.

Order Reaffirming Rule that Reallows Construction Authorizations During Natural Gas Rehearings

The [order](#) addresses rehearing arguments concerning FERC's 2025 final rule that eliminated 18 CFR § 157.23, which had restricted the issuance of construction authorizations for natural gas infrastructure while rehearing requests were pending. FERC reaffirms the rule's effective date—November 10, 2025—and upholds its decision to remove the regulation, explaining that evolving reliability needs, rising natural gas and electricity demand, and the availability of alternative protections (such as judicial review, motions for stay, and FERC's presumptive stay policy) make 18 CFR § 157.23 unnecessary.

FERC Upholds Approval of Constellation Energy's Purchase of Calpine

FERC [affirmed](#) in part its order approving Constellation Energy’s merger with Calpine with minor modifications, reaffirming that the transaction remains consistent with the public interest. FERC rejected arguments from protestors claiming the FERC failed to examine increased risks of market power, supply withholding, generator withdrawal, and impacts on Pennsylvania’s wholesale supply procurements, finding that protestors did not provide substantial, specific evidence to rebut the applicants’ competitive analysis. FERC also denied requests for additional discovery, holding that the existing record adequately demonstrates that the merger poses no adverse effects on competition, rates, or regulation. FERC modified the removal of a one-year notification requirement related to post-merger generator removals, which FERC found unnecessary given the merger’s approved mitigation measures.

III. U.S. DEPARTMENT OF ENERGY (DOE)

Executive Order for Department of Defense to Purchase Coal Power

President Trump signed an [executive order](#) ordering the Department of Defense, in coordination with the DOE, to approve long-term PPAs or similar contracts with coal-fired energy production facilities to serve Department of War “installations and other mission-critical facilities.”

Emergency Order Keeping Coal Plant Online

DOE issued its fourth [emergency order](#) keeping the J.H. Campbell Generating Plant 1 plant online, issued pursuant section 202(c) of the FPA and section 301(b) of the Department of Energy Organization Act. In 2021, Consumers Energy Company noted that it had intended to retire the plant by May 31, 2025.

DOE Secretary Chris Wright noted that he “determined that MISO likely faced tight reserve margins due to well documented year-round resource adequacy concerns” and that “the continued operation of the Campbell Plant would provide additional generation capacity during these periods.”

IV. INDEPENDENT SYSTEM OPERATORS (ISO) AND REGIONAL TRANSMISSION ORGANIZATIONS (RTO)

CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

Stakeholder Initiatives: Upcoming Meetings and Deadlines

Resource Adequacy Modeling and Program Design Working Group. The CAISO will host a virtual meeting for the Resource Adequacy Modeling and Program Design working group on March 2, 2026, to discuss track 2 Resource Adequacy Availability Incentive

Mechanism reform options. Written comments on the working group meeting are due by the end of the day March 16, 2026. The meeting details can be found [here](#).

Day-Ahead Market Enhancements: Configurable Parameters Implementation Working Group Meeting. The CAISO will host a Day-Ahead Market Enhancements Configurable Parameters Implementation Group Meeting on February 26, 2026. The CAISO will present analysis results for the set of enforced restraints, the envelope multipliers, and the proportion of deployed reserves. According to the CAISO, this meeting is for informational and convenience purposes only. Meeting details can be found [here](#).

Large Load Considerations. The written comment deadline for the Large Load Considerations [issue paper](#) and information session has been moved to February 25, 2026.

Western Energy Markets Regional Issues Forum. The Western Energy Markets Regional Issues Forum's hybrid in-person/virtual meeting will take place at the CAISO in Folsom, California, on March 16, 2026. The discussion is focused on the CAISO's 2026 Market Policy Initiative Catalog and Roadmap Process. Registration details can be found [here](#).