

REGULATORY UPDATE FOR MARCH 26, 2025 (WEEK OF MARCH 17, 2025)

CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC OR COMMISSION)¹

Proposed Decisions and Resolutions

Resolution (Res) E-5377 (Pacific Gas & Electric Mid-Term Reliability Contracts). This Resolution approves two mid-term reliability (MTR) long-term resource adequacy agreement with energy settlement storage contracts with Aypa Power Development (owner of Marici and San Gabriel LLCs) for a total of 500 megawatts of nameplate capacity expected to begin deliveries on September 1, 2027. The contract terms for each project are 15 years. Pacific Gas and Electric Company (PG&E) procured these resources to satisfy a portion of its MTR requirements.

Application (A.) 23-06-023 (Application of PG&E for Approval of its Woody Biomass to Renewable Natural Gas Pilot Project). PG&E filed this application pursuant to Commission Decision (D.) 22-02-025, which required PG&E to propose at least one woody biomass gasification project focused on converting woody biomass to biomethane to be funded using \$16.936 million of PG&E's Cap-and-Trade proceeds for eligible infrastructure costs. PG&E proposed to fund a woody biomass pilot project to be implemented by West Biofuels, LLC. This decision denies PG&E's application. This decision directs PG&E to use the Tier 2 Annual Gas True-Up of Gas Transportation Balancing Accounts for Rates Effective January 1, 2026, advice letter to return the \$16.936 million of Cap-and-Trade proceeds, including interest, to ratepayers through the California Climate Credit in 2026.

Res G-3611. (San Diego Gas & Electric Company's (SDG&E) request for recovery of the Transmission Integrity Management Program Balancing Account for January 1, 2019 to July 31, 2023). SDG&E filed AL 3257-G seeking recovery of the revenue requirement undercollection in the TIMP Balancing Account (TIMPBA), as of July 31, 2023. AL 3257-G-A replaced AL 3257-G in its entirety; it trued up the balance in the TIMPBA for the remainder of the GRC cycle (August 1, 2023-December 31, 2023), included actual and projected interest through December 2024, and made corrections to the original filing. AL 3257-G-A reduced the under-collection request from \$23.3 million to \$21.7 million. This Resolution approves SDG&E's cost recovery request of approximately \$21.7 million of revenue requirement.

A.22-07-005 (In the Matter of the Application of Crimson California Pipeline L.P. for Authority to Increase Rates for Its Crude Oil Pipeline Services). This decision authorizes Crimson California Pipeline, L.P. (Crimson) to increase the rate charged for the intrastate transportation of crude oil on its KLM pipeline to \$2.0471 per barrel transported effective

¹ Per the CPUC's 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.



September 1, 2022. The decision further authorizes the retroactive charge and collection of the difference between the rates billed by Crimson and the approved rate beginning March 3, 2023. The decision also authorizes San Pablo Bay Pipeline Company LLC (SPBP) to increase the rates charged for the intrastate transportation of crude oil on its pipeline system to \$2.0471 per barrel transported effective March 1, 2023. The decision further authorizes the retroactive charge and collection of the difference between the rates billed by SPBP and the approved rate beginning March 1, 2023.

Voting Meeting

The CPUC will hold a <u>voting meeting</u> in San Francisco, California on April 3, 2025 at 11:00 am PT.

Events and Workshops

Submetering and Telematics Workshop (Transportation Electrification). The CPUC will host a workshop on Tuesday, April 15, 2025 from 10:00 am - 4:00 pm PT, to discuss submetering and telematics issues relating to utility efforts to adopt plug-in electric vehicle protocols. Discussions will focus on implementation challenges, timing targets, and stakeholder input. The workshop will be held both remotely and in-person, at the CPUC Auditorium located at 505 Van Ness Avenue, San Francisco. A link to the virtual workshop is available here.

Vehicle-Grid Integration Forum. The CPUC is convening an in-person VGI Forum on Wednesday, April 16, 2025, 9:00 am - 4:30 pm PT. The Forum will be conducted by Joint IOUs (PG&E, Southern California Edison, and SDG&E) and will be centered around the following issues: (1) rates and demand flexibility programs; (2) technology enablement; and (3) planning. Attendees should register here, and a remote viewing option will be available for those unable to attend in person.

CALIFORNIA INDEPENDENT SYSTEM OPERATOR (CAISO)

Stakeholder Initiatives: Upcoming Meetings and Deadlines

Generator Interconnection Transmission Plan Deliverability. CAISO announced that the due date for affidavits from interconnection customers seeking to obtain or to retain allocations of Transmission Plan Deliverability (TPD) for the 2025 TPD allocation cycle will be August 29, 2025, at 5:00 pm PT, moved from September 1, 2025, which is Labor Day. The results of the 2025 TPD allocation study are expected to be provided by the end of the first quarter of 2026. Further information is available here.

Interconnection Customer User Group. CAISO is establishing a new Interconnection Customer user group, which will meet every other Tuesday at 1:00 pm PT, beginning on March 18, 2025. This call provides an opportunity to discuss industry questions and concerns regarding infrastructure policies and processes, including transmission planning and development, interconnection, deliverability, and contracting. Registration is required. Further information is available here.



Congestion Revenue Rights Enhancements. CAISO will host a public stakeholder call for the Congestion Revenue Rights (CRR) Enhancements initiative on April 1, 2025. This session will feature speakers from ISOs and RTOs who will focus on how CRR financial transmission rights markets are structured in their respective markets. Further information is available here.

Distributed Generation Deliverability Assessment. CAISO has posted the distributed generation deliverability assessment results for the 2025 cycle. Eligible distributed generation facilities that are seeking an initial or increase in deliverability status must apply for deliverability status assignment. Further information is available here.

2024 Transmission Plan Deliverability Allocation Report. CAISO has posted the revised 2024 Transmission Plan Deliverability Allocation Report to its website, available here.

Western Energy Markets Regional Issues Forum. The Western Energy Markets Regional Issues Forum will take place at PacifiCorp in Portland, Oregon on April 9, 2025. Registration is requested for in-person attendees. Additional information and the agenda is available here.

2025 CAISO Legal Forum. CAISO will host its Legal Forum on Thursday, April 10, 2025 at its headquarters in Folsom, California. This event provides opportunities for legal professionals from the energy industry to network, discuss current legal topics, gain Minimum Continuing Legal Education credit, and tour the CAISO control room overlook. Further information is available here.

CALIFORNIA ENERGY COMMISSION (CEC)

2024 Integrated Energy Policy Report (IEPR) Update

The CEC is working on its 2024 IEPR Update, and ongoing workshops were held through December 2024 to develop the record. The policy recommendations included in the 2024 IEPR Update will be based on the record developed during the proceedings, including data and technical analyses by staff and stakeholders. Comments on the draft IEPR were due in early January 2025. According to the workshop schedule published in December 2024 (which is subject to change), potential adoption of the 2024 IEPR Update was initially scheduled for the March 17, 2025 Business Meeting. However, upon review of the March 17 meeting agenda, there is no mention of the 2024 IEPR Update. Thus, the 2024 IEPR Update remains in draft form.

2025 IEPR

On March 20, 2025, the CEC posted the Scoping Order for the 2025 IEPR.

Last week, the CEC provided an <u>updated workshop schedule</u> for the 2025 IEPR. Workshop topics and dates included in the notice are below (note: the workshop schedule is subject to change):



- May 7, 2025: IEPR Staff Workshop on Electricity Forms & Instructions (remote access only)
- June 16, 2025: IEPR Commissioner Workshop on Interconnection
- June 25, 2025: IEPR Commissioner Workshop on Load Flex Goal Analysis Update
- July 29, 2025: IEPR Commissioner Workshop on Hydrogen (Senate Bill 1075) and Zero Carbon Resource (Senate Bill 423)
- August 6, 2025: IEPR Commissioner Workshop on Inputs & Assumptions (remote access only)
- August 26, 2025: IEPR Commissioner Workshop on Load Modifier Design (remote access only)
- November 13, 2025: IEPR Commissioner Workshop on Load Modifier Results (remote access only)
- December 2, 2025: IEPR Commissioner Workshop on Forecast (remote access only)

Wave and Tidal Energy

CEC Staff will host a remote-access workshop on April 2, 2025 "to present and gather feedback on the Draft Consultant Report on Sea Space Analysis for Wave and Tidal Energy" pursuant to Senate Bill (SB) 605 (Draft Report). Under SB 605, the CEC must evaluate the feasibility, costs, and benefits of wave and tidal energy off the California coast. According to the workshop Notice, the Draft Report and a workshop schedule will be posted before the workshop in Notice, the Draft Report and a workshop schedule will be posted before the workshop in Notice, the Draft Report and a workshop schedule will be posted before the workshop in Notice, the Draft Report are due to the Docket Unit by 5:00 pm on May 16, 2025.

2025 California Demand Flexibility Summit

The CEC will host the California Demand Flexibility Summit at the UC Davis Conference Center on May 22, 2025. According to the Save the Date, issued in February, the summit will provide an "opportunity to discuss the progress and challenges in achieving California's load shift goal of 7,000 megawatts by 2030." Registration for the California Demand Flexibility Summit is now open.

Tribal Energy Summit

On March 18, 2025, the CEC hosted a <u>Tribal Energy Summit</u> at the California Natural Resources Agency building in Sacramento, California. Additional details regarding the summit are available in the <u>Notice</u>. This was an in-person only event.



RPS Annual Reports

The CEC issued a notice for certified facilities subject to the annual reporting obligation to report generation and fuel use data to submit their reports by April 1, 2025. Additional details regarding the reporting requirements are available here.

Joint Agency Reliability Planning Assessment

On March 24, 2025, the CEC posted its Joint Agency Reliability Planning Assessment, which is prepared in collaboration with the CPUC, to Docket 21-ESR-01. The report is required pursuant to SB 846 and includes updates on electric system demand and supply for the next five-and one-year periods, as well as an assessment of electric system reliability under different risk scenarios. This latest assessment, published in March, is the fourth quarterly report providing an update since the August 2024 report was published. It includes an update on electric demand and supply forecasts and new resources brought online in June-September 2024.

CEC Business Meetings

The next CEC Business Meeting is scheduled for April 10, 2025.

CALIFORNIA AIR RESOURCES BOARD (CARB)

Satellite Methane Data Tracking

On March 21, 2025, CARB announced it is moving forward with a satellite data project to track and reduce methane emissions. The technology involves satellite-mounted methane sensors which send data to enable the state to locate and monitor large emissions of methane that could otherwise go undetected. This data will allow state and local agencies to work together with industry to stop leaks and protect public health. The type of satellite in this project will not see all methane emitted and will only be able to detect large, localized leaks from individual "point" sources.

Low Carbon Fuel Standard (LCFS) Regulation Update

On February 25, 2025, CARB received a document from the Office of Administrative Law (OAL) detailing requested non-substantive revisions to the text of the LCFS regulation amendments. The LCFS regulation sets a declining carbon intensity target for transportation fuels used in California. Staff has 120 days to make these changes and re-submit the regulation for OAL approval. The current regulation remains in effect as CARB staff work to address the feedback from OAL.

Meetings and Workshops

On **April 30, 2025 at 10:00 am**, CARB will host a <u>seminar</u> for a research study measuring light-duty vehicle exhaust emissions using roadside-deployed remote sensing devices at eight California locations. The seminar will also discuss the results of using these measurements and other relevant data to analyze several policy-relevant topics, including long-



term vehicle emission trends and emission characteristics disparities for communities of different socioeconomic status.

Opportunities for Public Comment

Pursuant to section 95488.5(d) of the LCFS Regulation, the CARB Executive Officer has certified the 2025 annual update to the carbon intensities (CIs) of the following two Lookup Table Pathways:

- California Average Grid Electricity Used as a Transportation Fuel in California
- Electricity Supplied Under the Smart Charging or Smart Electrolysis Provision

These two pathways are posted for a 45-day <u>public comment period</u> that ends on **May 8**, **2025.** The updated pathway CI values are available for quarterly fuel reporting in 2025, beginning with Q1.

MINNESOTA PUBLIC UTILITIES COMMISSION (MPUC)

On March 27, 2025, at its weekly agenda meeting, the MPUC will consider whether to reconsider its January 23, 2025 Order delegating authority to open a new rulemaking proceeding to clarify that "capacity," as defined under Minn. Stat. § 216B.164, subd. 2a(c), for purposes of eligibility for net-metering in Minn. Stat. § 216B.164, subd. 3(d), is determined by, and measured at, the qualifying facility's inverter or a power control system or supplemental device that controls production at the qualifying facility before the net-metered customer's load (Docket No. E002,111,017,015/CI-24-200). The MPUC will also consider whether to approve Xcel Energy's proposed timing and methodology for refunds related to the 2011-2013 Sherco 3 outage (Docket Nos. E002/GR-12-961; E002/GR-13-868; E999/AA-13-599; E999/AA-14-579; E999/AA-16-523; E999/AA-17-492; E999/AA-18-373).

FEDERAL ENERGY REGULATORY COMMISSION (FERC)

On March 20, 2025, at 10:00 am ET, FERC held the March 2025 Commission Open Meeting. The agenda is available here. At the Open Meeting, FERC issued several orders on Order Nos. 2023 and 2023-A compliance, including:

E-3 | Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, Docket Nos. ER24-1554-000 and ER24-1554-001: The order accepts Duke Energy Carolinas, LLC and Duke Energy Progress, LLC's Order Nos. 2023 and 2023-A compliance filing in part, and directs Duke to submit a further compliance filing.

E-4 | Basin Electric Power Cooperative, Docket No. ER24-2043-000: The order accepts Basin Electric Power Cooperative's Order Nos. 2023 and 2023-A compliance filing in part, and directs Basin Electric Power Cooperative to submit a further compliance filing.



E-5 | Lucky Corridor, LLC, Docket No. ER24-2036-000: The order accepts Lucky Corridor, LLC's Order Nos. 2023 and 2023-A compliance filing in part, and directs Lucky Corridor, LLC to submit a further compliance filing.

Additionally, FERC issued an Order Accepting Tariff Revisions, Subject To Condition in 190 FERC ¶ 61,169, that accepts Southwest Power Pool, Inc.'s (SPP) proposed revisions to its Tariff and Governing Documents to facilitate the commitment of several entities in the Western Interconnection (Basin Electric Power Cooperative; Colorado Springs Utilities; Deseret Generation and Transmission Cooperative, Inc.; Municipal Energy Agency of Nebraska; Platte River Power Authority; Tri-State Generation and Transmission Association, Inc.; Western Area Power Administration – Colorado River Storage Project Management Center; Western Area Power Administration – Rocky Mountain Region; and Western Area Power Administration – Upper Great Plains Region) to join SPP's Regional Transmission Organization, RTO West, as transmission-owning members. FERC accepted the proposed revisions to the Tariff and Governing Documents, subject to condition, and directed SPP to submit a compliance filing within 30 days of the date of the order. FERC also directed SPP to submit an informational filing notifying FERC of the actual effective date of the Tariff and Governing Documents revisions no later than six months prior to the date SPP implements the proposed revisions.

Lastly, on March 20, FERC issued its annual <u>2024 State of the Markets Report</u> to provide the industry and public with key information on market conditions and emerging issues in natural gas and electricity markets as well as significant market trends and fundamentals for the year. The report outlines the following findings:

- Electricity demand increased across all regional organized markets by 2.8%.
- Overall, natural gas and wholesale electricity prices declined, although retail prices to consumers continued to increase.
- Extreme weather, the resource mix, and electric load growth significantly impacted wholesale electricity markets.
- For the first time in several years, the total capacity of active projects waiting in the interconnection queue declined on an annual basis. Total capacity active in interconnection queues at the end of 2024 totaled 2,289 GW, down from 2,368 GW in 2023.
- Most capacity additions came from solar, natural gas, battery storage, and wind resources.
- More coal generation capacity was retired in 2024 than any other resource type, although natural gas capacity also continued to retire.
- Among the RTO/ISOs, the Midcontinent ISO experienced the most retirements.
- Over 5,000 circuit miles of transmission projects entered service.