

AGENDA

ORANGE COUNTY POWER AUTHORITY MEETING OF THE LEGISLATIVE AND REGULATORY COMMITTEE Thursday, August 27, 2026 3:30 p.m.

This meeting will proceed as an in-person meeting at **15310 Barranca Parkway, Suite 250, Irvine, CA 92618**. In addition, as a convenience to the public, the Orange County Power Authority is also providing an option for members of the public to remotely view and participate in the meeting. Further details are below. Please note that, in the event of a technical issue causing a disruption in the remote participation option, the meeting may continue unless otherwise required by law.

Public Comments: Any member of the public may provide comments to the Committee on any agenda item by requesting to speak during Item 4, or on any matter not appearing on the agenda but within the jurisdiction of the Committee by requesting to speak during Item 5. When providing comments to the Committee, it is requested that you provide your name and city of residence for the record. Commenters are requested to address their comments to the Committee as a whole through the Chair. Comments may be provided in the following manner:

Request to Speak: To provide comments during the meeting, in-person attendees, please fill out the public speaker slip and provide it to the clerk at the beginning of the meeting. Before Items 4 and 5, the Chair or Clerk will ask members of the public to join the queue to provide public comment. The queue will remain open for a reasonable amount of time to allow members of the public sufficient time to request to speak and inform the Committee of the number of speakers. After such time, the queue will be closed and the members of the public who have joined the queue to speak will be recognized at the appropriate time may speak. To join the queue on Zoom video conference by computer or mobile phone, use the "Raise Hand" feature. If joining the meeting using the Zoom dial-in number, you can raise your hand and join the queue by pressing *9. Members of the public will not be shown on video but will be able to speak when called upon.

Comments shall generally be limited to three minutes when speaking, provided that the Chair may equally reduce each speaker's time to accommodate a large number of speakers or a large number of agenda items.

Written Communications: If you have a written communication that you wish to be distributed to the Committee, please provide it via e-mail to comments@ocpower.org. Written communications are public records and, if received by 5:00 p.m. on the day prior to the meeting, will be distributed to the Committee prior to the meeting by either e-mail or hard-copy, posted on the Authority's website and noted, but not read, at the meeting. Communications received after the 5:00 p.m. deadline will be retained in the Authority's records.

The public may participate using the following remote options:

ZOOM WEBINAR

Please click the link below to join the webinar:

[Launch Meeting - Zoom](#)

Dial-in: 1-669-900-6833

Webinar ID: 893 8232 1729

1. **CALL TO ORDER**

2. **PLEDGE OF ALLEGIANCE**

3. **ROLL CALL**

4. **PUBLIC COMMENTS ON AGENDA ITEMS**

Opportunity for members of the public to address the Committee on any items on the agenda.

5. **PUBLIC COMMENTS ON NON-AGENDA ITEMS**

Opportunity for members of the public to address the Committee on any items not on the agenda but within the jurisdiction of the Committee.

6. **COMMITTEE MEMBER ANNOUNCEMENTS**

Committee Members may briefly provide information to other members of the Committee and the public, ask questions of staff, or report on conferences, events, or activities related to Authority business. There is to be no discussion or action taken on comments made by Committee Members unless authorized by law.

7. **CONSENT CALENDAR**

All items listed under the Consent Calendar are considered to be routine and may be enacted by one motion. There will be no separate action unless members of the Committee request specific items be removed from the Consent Calendar.

**1. MINUTES FOR THE LEGISLATIVE AND REGULATORY COMMITTEE
MEETING OF JUNE 2, 2026**

Recommended Action:

Approve as submitted.

8. **REGULAR CALENDAR**

The following items call for discussion or action by the Committee. The Committee may discuss and/or take action on any item listed below if the Committee is so inclined.

1. LEGISLATIVE UPDATE

Recommended Action:

Receive and file.

2. REGULATORY UPDATE

Recommended Action:

Receive and file.

3. CalCCA UPDATE

Recommended Action:

Receive and file.

9. ADJOURNMENT

Compliance with the Americans with Disabilities Act

OCPA meetings comply with the protections and prohibitions of the Americans with Disabilities Act. Individuals with a disability who require a modification or accommodation, including auxiliary aids or services, in order to participate in the public meeting may contact 949-263-2612. Requests for disability-related modifications or accommodations require different lead times and should be provided at least 72-hours in advance of the public meeting.

Availability of Documents

Copies of the agenda and agenda packet are available at www.ocpower.org. Late-arriving documents related to a Committee meeting item which are distributed to a majority of the Committee prior to or during the Committee meeting are available for public review as required by law. Public records, including agenda-related documents, can be requested electronically at clerk@ocpower.org or by mail to 15642 Sand Canyon Avenue, P.O. Box 54283, Irvine, CA 92619-4283. The documents may also be posted at the above website. Such public records are also available for inspection, by appointment, at 15310 Barranca Parkway, Suite 250, Irvine, CA 92618. Please contact clerk@ocpower.org to arrange an appointment.



**MINUTES
REGULAR MEETING
LEGISLATIVE AND REGULATORY COMMITTEE
ORANGE COUNTY POWER AUTHORITY**

Tuesday, June 2, 2026

1. CALL TO ORDER

Chair Sonne called to order the Legislative and Regulatory Committee Meeting at 12:03 p.m., on Tuesday, June 2, 2026.

2. PLEDGE OF ALLEGIANCE

Chair Sonne led the Pledge of Allegiance.

3. ROLL CALL

Present:	Chair Susan Sonne	City of Buena Park
	Director Katheleen Treseder	City of Irvine

4. PUBLIC COMMENTS ON AGENDA ITEMS

None.

5. PUBLIC COMMENTS ON NON-AGENDA ITEMS

Vicki Johnson, resident of Laguna Woods, joined via Zoom and made comments regarding the new Regulatory & Legislative Manager.

6. DIRECTOR ANNOUNCEMENTS

None.

7. CONSENT CALENDAR

Moved by Chair Sonne, seconded by Director Treseder to approve consent calendar.

The motion carried unanimously by the following vote:

Ayes:	Chair Sonne, Director Treseder
Noes:	None
Absent:	None

**1. MINUTES FOR THE LEGISLATIVE AND REGULATORY COMMITTEE
MEETING OF MARCH 23, 2026**

Action Taken:

Approved as submitted.

8. REGULAR CALENDAR

1. LEGISLATIVE UPDATE

Regulatory & Legislative Manager Frank Harris presented the item and provided a summary of the bills monitored by OCPA, high-priority legislation, and the potential outcomes. He gave an overview of the legislative events calendar 2026. Harris updated the committee on AB 1761 (Rogers) Data Disclosure; SB 1138 (Padilla) LSE RA Requirements; AB 1787 (Shultz) Dynamic Rates; AB 2383 (Zbur) Large Load Ratemaking; SB 866 (Padilla) Reliability and Large Loads; and AB 710 (Irwin) Dynamic Rates. He listed the key deadlines and strategic focus of OCPA.

Action Taken:

Received and filed.

2. REGULATORY UPDATE

Regulatory Analyst Matt Chill presented the item and provided updates on regulations monitored by OCPA, including PCIA Proceeding Tracks; IRP Procurement Order; the Direct Access (DA) decision; Climate Credit updates; and Amendments to the Cap and Invest Program. He listed the key deadlines and strategic focus of OCPA.

Action Taken:

Received and filed.

9. ADJOURNMENT

With no further business to come before the Committee, Chair Sonne adjourned the March 23, 2026, Orange County Power Authority Legislative and Regulatory Committee meeting at 12:49 p.m.

Chair Sonne noted that the next Legislative and Regulatory Committee meeting will be held on Thursday, August 27, 2026, at 3:30 p.m.

Submitted by:

Rogelio Palacios, Board Secretary

ORANGE COUNTY POWER AUTHORITY

Staff Report – Item 8.1

To: Orange County Power Authority Board of Directors
From: Frank Harris, Regulatory and Legislative Manager
Matt Chill, Regulatory Analyst
Approved by: Joe Mosca, Chief Executive Officer
Subject: LEGISLATIVE UPDATE
Date: August 27, 2026

STRATEGIC GOALS

- ☐ Enrich & Grow the OCPA Community
- ☐ Prioritize Fiscal Sustainability & Affordability
- ☐ Design & Deploy Community-Aligned Customer Programs
- ☐ Energize Our Community with Renewable Energy Sources
- ☒ Raise Awareness of Community Energy & Advocate for Our Customers
- ☐ Not Applicable

RECOMMENDED ACTION(S)

Receive and file.

BACKGROUND

Orange County Power Authority (OCPA) staff track and analyze bills in the California Legislature and in the United States Congress. OCPA actively advocates on behalf of its customers and contributes to CalCCA's legislative affairs efforts.

DISCUSSION ANALYSIS

California Legislative Update

California's 2026 legislative session comes to an end on August 31, 2026. September 30, 2026, is the last day the Governor can sign any passed bills. CalCCA has sponsored two bills, SB 1138 (Padilla) and AB 1761 (Rogers). August brought key committee meetings involving CalCCA-sponsored legislation and other bills with significant potential impact on OCPA. Specific updates are discussed below.

Diablo Canyon Extension

At the February 2026 Board Meeting, R&L staff expressed a strong likelihood that there would be legislation introduced in 2026 to extend the operation of Diablo Canyon Power Plant (DCPP) through 2045. Since then, there have been rumors, but no actual bill language. Further, at an August 7, 2026, press conference, Governor Newsom remarked that a DCPP extension “will be the determination of the next administration.” While Newsom did not explicitly state he would veto any DCPP extension bill that comes to his desk in 2026, his comments suggest he doesn’t want the legislature to send him one.

Issues related to the DCPP extension are complex, and in the future, OCPA may have an opportunity to advocate for a policy that best aligns with our customers’ needs. As such, OCPA staff will continue to monitor DCPP-related activities and discuss them at a future R&L Committee meeting and at a future Board meeting.

CalCCA Sponsored Legislation

CalCCA has sponsored two bills this session. Senate Bill (SB) 1138, CalCCA’s sponsored Resource Adequacy (RA) Transactability legislation, was introduced by Senator Padilla. Assembly Bill (AB) 1761, CalCCA’s Power Charge Indifference Adjustment (PCIA) data disclosure legislation, was introduced by Assemblymember Rogers. These bills are part of our strategy to address energy affordability concerns and ultimately drive down costs for OCPA customers. No single effort or solution will solve the energy affordability challenges facing ratepayers statewide. Meaningfully reducing the high cost of electricity bills in California will require multiple small-to-moderate enhancements, such as those referenced in these bills.

[SB 1138 \(Padilla\) – RA Transactability](#)

Background: SB 1138 would require the CPUC to permit Load Serving Entities (LSEs) to trade RA obligations to each other up to 25% of their total compliance obligations. Such a modification furthers the intent of the Slice of Day RA framework to enable greater systemwide efficiency and cost savings within the RA program.

Update: On May 19, 2026, the Senate passed SB 1138 by a 31-0 vote. In the Assembly, the bill passed through the Utilities and Energy Committee by an 18-0 vote. However, the Assembly Appropriations Committee held the bill. Since this is the second year of the 2025-2026 legislative session, the bill is dead and cannot be carried over to the 2027-2028 session.

[AB 1761 \(Rogers\) – PCIA Data Disclosure](#)

Background: AB 1761 would require that all data used to inform the PCIA calculation and other rate elements from the CPUC and investor-owned utilities (IOUs) be made available to all LSEs and ratepayer advocates on behalf of impacted customers. On April 24, 2026, OCPA submitted a support letter for AB 1761 to the Assembly Appropriations Committee.

Update: On May 27, 2026, the Assembly passed the bill and sent it to the Senate. On June 30, 2026, the bill passed the Senate Committee on Energy, Utilities and Communications and was sent to the Appropriations Committee. The Appropriations Committee passed the bill on August 13, 2026, and is currently waiting on a third reading.

Additional Legislation of Interest

The legislature continues to express concern about data centers and how their expansion may affect other customers. OCPA is tracking two bills focused on data centers. AB 2383 (Zbur) and SB 886 (Padilla) are both designed to prevent potential cost shifts. While OCPA supports this principle, there is language in each that challenges CCA autonomy. The legislature also has an interest in dynamic ratemaking. OCPA is tracking two bills referencing dynamic rates. AB 710 (Irwin) requires each electric corporation to offer optional dynamic pricing tariffs. AB 1787 (Schultz) requires large electrical corporations that request smart meter upgrades to offer customers at least one optional dynamic pricing tariff.

[AB 2383 \(Zbur\) – Data Center Ratemaking](#)

Background: AB 2383 intends to incorporate consumer protections against cost shifting onto non-large-load customers. While OCPA firmly supports this core principle and is open to incorporating related language into statute, the bill initially gave the CPUC authority over CCA ratemaking for large-load customers. OCPA opposes any legislation that would shift ratemaking authority from our board to the CPUC. OCPA submitted an “oppose unless amended” letter to the Assembly Appropriations Committee, and directly to Assemblymembers Tri Ta and Diane Dixon. In this letter, OCPA requested that the bill's author work with CalCCA on amendments to restrict CPUC jurisdiction over ratemaking to the IOUs alone. On May 15, 2026, CalCCA spoke with Assemblymember Zbur's office. The Assemblymember then sent CalCCA new amendments that include language specifying that the CPUC's Ratemaking authority applies solely to the IOUs. CalCCA continues to work with the Assemblymember's office to address additional issues. As a result of this language change, CalCCA has removed its oppose-unless-amended position.

Update: This bill passed out of the Appropriations Committee and has been ordered to its third reading.

[SB 886 \(Padilla\) – Data Center Ratemaking and Generation Sources](#)

Background: SB 886 also addresses concerns about cost shifting from large energy users to non-large energy users. OCPA supports this principle. However, the bill also stipulates that large energy users prefund a contract of at least 15 years in duration through their LSE and provide dispatchable reliability assets within their LSE's service territory. While neither CalCCA nor OCPA has taken a position on this bill, OCPA holds as a core principle that our governing board shall have authority over our overall rate structures and customer contracting terms. This bill directs the LSEs to use a specific contract type to preclude the potential of a cost shift.

Update: This Assembly Appropriations Committee passed this bill and referred it to a third reading. CalCCA continues to work with the author to address the disagreeable language.

[AB 710 \(Irwin\) – Dynamic Rates](#)

Background: This bill directs the CPUC to require each electrical corporation to offer optional dynamic pricing tariffs and deploy Automatic Metering Infrastructure (AMI) for all customers, pending a feasibility analysis.

Update: On August 13, 2026, the Senate Appropriations Committee held the bill. Since this is the second year of the 2025-2026 legislative session, the bill is dead and cannot be carried over to the 2027-2028 session.

[AB 1787 \(Schultz\) – Dynamic Rates](#)

Background: This bill would require large electrical corporations that request smart meter (AMI) and billing system upgrades to offer customers at least one optional dynamic-rate tariff, including both bundled and unbundled customers. On March 18, 2026, AB 1787 passed through the Assembly Utilities and Energy Committee with amendments, with a 13-0 vote. These amendments call for adequate protections and safeguards for customers. These are additions that OCPA supports. On May 26, 2026, the bill passed out of the Assembly and was referred to the Senate.

Update: The Senate Appropriations Committee held the bill on August 13, 2026. Since this is the second year of the 2025-2026 legislative session, the bill is dead and cannot be carried over to the 2027-2028 session.

[AB 2266 \(Schultz\) - Reporting Consistency](#)

Background: This bill would require the commission, on or before January 1, 2030, to complete a process to consolidate certain plans submitted by load-serving entities into a single procurement plan, and would require the CPUC, when feasible, to consolidate certain compliance reporting for reliability requirements, as specified. CalCCA, the Alliance for Retail Energy Markets (AREM), AVA Community Energy, and the Environmental Defense Fund (EDF) have taken support positions. Only the Independent Energy Producers (IEP) filed a formal oppose position.

Update: The bill passed out of the Appropriations Committee and has been sent to the floor for a third reading.

Bills on Which CalCCA Took a Position

[AB 706 \(Aguiar-Curry\) - Biomass](#)

Background: This bill authorizes additional funding from the Greenhouse Gas Reduction Fund (GGRF) or the Timber Regulation and Forest Restoration Fund to promote additional biomass electrical generation via vegetation management activities in high fire threat regions. CalCCA has taken a support position.

Update: This bill passed out of the Appropriations Committee and has been ordered for a third reading.

[AB 2111 \(Papan\) - Transmission Planning](#)

Background: On December 23, 2022, the PUC, the Energy Commission, and the ISO entered into a memorandum of understanding related to resource and transmission planning, transmission development and permitting, procurement, and interconnections to achieve reliability and policy needs and to coordinate the timely development of resources, resource interconnections, and needed transmission infrastructure. Existing law requires the CEC and CPUC, in coordination with the CAISO, to review the memorandum of understanding and a related workplan every five years to ensure the memorandum and workplan reflect the coordination that is needed to help meet the state's energy goals. This bill would require the CAISO, CEC, and the CPUC, on or before January 1, 2028, to update the memorandum and workplan to, among other things, ensure they reflect the requirements of the Federal Energy Regulatory Commission, as applicable. CalCCA has taken a support position.

Update: This bill passed out of the Appropriations Committee and has been ordered for a third reading.

[AB 2234 \(Papan\) - Geothermal](#)

Background: Existing law requires wells included within a geothermal exploratory project to be located at least 1/2 mile from geothermal development wells that can produce geothermal resources in commercial quantities. The bill would specify that the above-described 1/2-mile limit is measured from any point along the wellhead location and well course and would exclude certain wells connecting to geothermal reservoirs from this limit if written consent is provided by the owner and operator of the geothermal development well that is producing in commercial quantities, as specified. CalCCA has taken a support position.

Update: The bill passed out of the Appropriations Committee and has been sent for a third reading.

[AB 2313 \(Berman\) - Gas Line Replacement](#)

Background: This bill, the Home Energy Choice Act, would require the CPUC, in a new or existing proceeding, to solicit proposals for, and require each gas corporation to offer, a Gas Distribution Service Line Replacement Alternatives Program, on or before January 1, 2028, to provide certain residential gas customers served by a gas distribution service line that will be replaced with a monetary incentive to deploy gas distribution service line replacement alternatives, as defined, and cease gas service to avoid the gas distribution service line replacement, as specified. CalCCA has taken a support position.

Update: This bill passed out of the Appropriations Committee and has been sent for a third reading.

[AB 2369 \(Rogers\) - Transmission Planning](#)

Background: Existing law requires the CPUC, in consultation with the CEC, to provide transmission-focused guidance to the CAISO about resource portfolios of expected future renewable energy resources and zero-carbon resources, as specified, to allow the CAISO to identify and approve transmission facilities needed to interconnect resources and reliably serve the needs of load centers. In providing that guidance, existing law requires the CPUC and the CEC to annually provide projections to support the Independent System Operator's planning and approvals in its annual transmission planning process. This bill would require the CPUC and CEC, as part of providing those projections, to also identify cost-effective opportunities to increase the reliability contribution or mitigate congestion of planned or existing energy-only resources through transmission capacity expansions. CalCCA has taken a support position.

Update: The bill passed out of the Appropriations Committee and has been ordered for a third reading.

FISCAL IMPACT

None.

ATTACHMENT(S)

None.

ORANGE COUNTY POWER AUTHORITY

Staff Report – Item 8.2

To: Orange County Power Authority Board of Directors
From: Matt Chill, Regulatory Analyst
Frank Harris, Regulatory and Legislative Manager
Approved by: Joe Mosca, Chief Executive Officer
Subject: REGULATORY UPDATE
Date: August 27, 2026

STRATEGIC GOALS

- ☐ Enrich & Grow the OCPA Community
- ☐ Prioritize Fiscal Sustainability & Affordability
- ☐ Design & Deploy Community-Aligned Customer Programs
- ☐ Energize Our Community with Renewable Energy Sources
- ☒ Raise Awareness of Community Energy & Advocate for Our Customers
- ☐ Not Applicable

RECOMMENDED ACTION(S)

Receive and file.

BACKGROUND

Orange County Power Authority (OCPA) staff actively participate in several proceedings at the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), the California Air Resources Board (CARB), the California Independent System Operator (CAISO), and the Federal Energy Regulatory Commission (FERC). This report includes a summary of high-priority proceedings.

DISCUSSION / ANALYSIS

California Public Utilities Commission Updates

[Power Charge Indifference Adjustment Proceeding – Rulemaking 25-02-005](#)

General Background: On February 11, 2025, the California Public Utilities Commission (CPUC) issued an Order Instituting Rulemaking (OIR) (R.) 25-02-005 to initiate a new proceeding related to the Power Charge Indifference Adjustment (PCIA). There are three tracks to R.25-02-005.

Track 1 Background:

Track 1 was an expedited track focused on potential modifications to the Resource Adequacy (RA) Market Price Benchmark (MPB). The CPUC issued Decision (D.) 25-06-049 on June 26, 2025. Among other details, the decision adopts a single RA MPB using three years of transaction data for the forecast calculation and four years of transaction data for the final calculation.

On July 28th, 2025, the California Community Choice Association (CalCCA) filed an Application for Rehearing (AFR) on Track 1 of the proceeding. CalCCA's AFR focused on CCAs' opposition on the CPUC's MPB calculation methodology for the 2025 Energy Resource Recovery Account (ERRA) True Up, asserting that this amounted to illegal retroactive ratemaking. On October 31, 2025, the CPUC issued D.25-10-061, denying CalCCA's AFR of D.25-06-049.

On December 1, 2025, CalCCA requested that the Court grant the Petition for Review of D.25-06-049 and reverse the Decision on the grounds that (1) the Decision violated the prohibition against retroactive ratemaking; and (2) the Decision's retroactive application to 2025 rates was not supported by adequate findings or substantial evidence in the record.

Track 1 Update:

On June 25, 2026, the 3rd District Court of Appeals denied CalCCA's Petition for Review of D.25-06-049, the CPUC's decision which applied the RA MPB modifications retroactively to the 2025 PCIA true-up. Reasoning for the denial was not provided by the lower court.

On July 6, 2026, CalCCA filed a Petition with the California Supreme Court on this same topic, requesting the Court to uphold California's prohibition on retroactive ratemaking and help ensure electricity costs are allocated fairly.

Track 2 Background

Within Track 2, the CPUC will determine whether the proposal to value Pre-2019 Banked Renewable Energy Credits (RECs) at a non-zero amount is consistent with applicable law and Commission precedent. If the CPUC finds valuation should be non-zero, it will also determine how any such value should be determined and allocated consistent with indifference principles for all customers.

On March 27, 2026, the CPUC released a Staff Report and Proposals on Pre-2019 Banked RECs.¹ This staff report does not draw a conclusion regarding the balance of indifference between departed and bundled load. The CPUC acknowledges the merits and challenges to the arguments of both CalCCA and the Investor-Owned Utilities (IOUs).

On May 12, 2026, CalCCA submitted testimony on the CPUC staff report which argued that the CPUC should value Pre-2019 Banked RECs at the Renewable Portfolio Standard (RPS) MPB to maintain indifference principles between bundled and unbundled customers. Using the RPS MPB in this manner would reflect the value of a REC in the year in which the IOUs would use Pre-2019 Banked RECs for compliance for bundled customers. The Investor-Owned Utilities (IOUs) argued that these RECs should be valued at \$0 within the PCIA.

Track 2 Update:

On August 13, 2026, the CPUC filed a Proposed Decision (PD) which addresses Track 2 of the PCIA proceeding. If the PD is approved, RECs banked before 2019 would be valued at \$0 for the purpose of calculating the PCIA. CalCCA and OCPA will continue to advocate on behalf of a non-zero valuation of these RECs in advance of a final decision being issued.

CalCCA, Cal Advocates, and the IOUs will have a chance to make final oral arguments on Track 2 issues on August 31, 2026. It is expected that the CPUC Commissioners will vote on the PD at the CPUC Voting Meeting on September 17, 2026.

Track 3 Background:

The third track within the PCIA proceeding is intended to consider wholesale changes to the PCIA. A scoping ruling has not yet been released to formalize the topics in scope within Track 3. However, CalCCA and other parties have submitted opening comments and reply comments, advocating for certain topics to be included and/or prioritized. CalCCA argued that Track 3 is supposed to be a broad consideration of PCIA revisions,

¹ See <https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=603533506>.

and that data access is imperative so that the CCAs can be on equal footing to the IOUs to develop proposals to enhance the PCIA.

[Track 3 Update](#)

On June 8, 9, and 15, the CPUC hosted workshops to discuss PCIA Track 3. The following details the topics that were discussed on each day:

- June 8 – Principles and approaches for achieving indifference
 - This included a broader discussion of principles and alternative approaches for achieving indifference
- June 9 – Prioritization of issues to reform the current PCIA
 - IOU Issues:
 - Reform the RPS MPB
 - Addressing negative PCIA
 - CalCCA Issues
 - Improved PCIA mechanisms to reduce rate volatility
 - Guidance for re-vintaging PCIA resources
 - Reform of the GHG-free MPB
- June 15 – Data access and confidentiality issues
 - CalCCA emphasized the need to receive data early in the Track 3 proceeding before the Track gains momentum
 - The IOUs argued for even more stringent requirements for the third-party representatives who view confidential data on behalf of the CCAs

[Resource Adequacy - R.25-10-003](#)

Background: R.25-10-003 continues the CPUC's oversight of the RA program. The rulemaking establishes forward RA procurement obligations for load-serving entities (LSEs) beginning with the 2027 compliance year and considers structural reforms to the program. R.25-10-003 is the successor to R.23-10-011, which addressed these topics over the past two years.

This rulemaking will address the 2027 and 2028 RA compliance years, local RA obligations for the 2027-2029 and 2028-2030 compliance years, and further refinements to the Slice of Day (SOD) program.

The CPUC's Report on Transactability indicated it did not believe the value of transactability justified the effort to implement it. Despite this disappointing result, CalCCA filed its proposal for RA Slice-of-Day (SOD) Transactability on March 3, 2026. CalCCA was the only party to file a proposal.

On June 1, 2026, the CPUC issued a Proposed Decision (PD) on the Resource Adequacy (RA) Track 1 issues. Notably, the CPUC elected not to adopt load obligation trading.

The CPUC approved [D.26-07-008](#) at its July 1, 2026, Voting Meeting. The Decision adopts system-wide local capacity requirements for 2027-2029 and flexible capacity requirements for 2027. This will ultimately inform OCPA's requirements for these compliance years. The Decision also made several granular updates to the RA program, resource eligibility, and compliance requirements. These updates will affect how OCPA may comply with the RA program in the future.

Update: Phase 2 Scope and Schedule:

- Loss of load expectation (LOLE) studies and Planning Reserve Margin (PRM) proposals were due on August 14, 2026. Other proposals will be due sometime in the fall, subject to a future ruling. CalCCA submitted the following proposals on August 14, 2026:
 - Establish a methodology for setting the PRM that achieves the 0.1 LOLE reliability standard at the least cost; and
 - Eliminate the effective PRM, which can drive up RA compliance costs, and replace it with one standard PRM for all LSEs based on robust LOLE modeling.
- CalCCA plans to submit the following proposals in the Fall:
 - Modify the Y+2 local RA requirement from 100 percent to 85 percent for the San Diego local area, given recent trends of reduced requirements between Y+2 and Y+1;
 - Adopt local RA CPE substitution requirements when resources procured by the CPE reduce availability after credits are allocated; and
 - Adopt DER RA pathways for load modifying DERs and end-user exporting PDRs.
- RA Implementation Workshop:
 - On August 13, 2026, CPUC's Energy Division held a *2027 RA Implementation Workshop* to review recent policy and implementation changes, providing updated guidance on LSE Showing Templates, and addressing related questions in advance of the 2027 RA Compliance Year. CPUC staff also presented the 2027 Year-Ahead load forecast.

[Integrated Resource Planning – R.25-06-019](#)

Background:

The Integrated Resource Planning (IRP) process requires the CPUC to identify a resource portfolio to ensure a reliable electric supply while also achieving the clean energy and environmental goals of SB 350 and SB 100. This OIR, issued on July 2, 2025, supersedes R.20-05-003 as the primary venue for CPUC oversight of the IRP process.

On February 26, 2026, the CPUC issued D.26-02-057, approving a procurement order for 6,000 megawatts (MW) of clean capacity for LSEs statewide. OCPA is now required to procure 25 MW of capacity in each of 2030, 2031, and 2032, for a total of 75 MW. Out of the 75 MW, OCPA must procure at least 19 MW of clean, firm resources and/or Long Duration Energy Storage (LDES).

Update:

The CPUC issued a notice on May 20, 2026, for a public workshop on July 23, 2026, which covered the upcoming Procurement Compliance Staff Proposal Addressing Good Faith Efforts and Net Cost of New Entry (Net CONE). On June 17, 2026, the CPUC requested a response to a set of questions to inform the workshop. OCPA supported the development of CalCCA's comments, which were submitted on July 14, 2026. These comments argued for the CPUC to maintain a flexible Good Faith Efforts Standard that balances the need for robust enforcement to incent resource development and the need for flexibility when external factors outside the control of an LSE prevent timely compliance with procurement orders.

At the workshop on July 23, 2026, the vast majority of commenters at the workshop were in favor of keeping a flexible good faith efforts standard for unforeseen circumstances out of an LSE's control, maintaining Net CONE as the basis for non-compliance costs, and defining a project delay as a resource coming online after the compliance deadline. Comments from CPUC staff were minimal, but they expressed a desire for a clearer definition of the good-faith effort standard and noted the challenges in aligning the IRP process with the RA and RPS processes.

The CPUC also provided clarity on the next steps and schedule for the Procurement Compliance Staff Proposal, as illustrated below:

- November 2026 – Procurement Compliance Staff Proposal
- December 2026 to January 2027 – Party Comment Timeline on Staff Proposal
- May 2027 – Proposed Decision
- July 2027 – Final Decision

[Reliable and Clean Power Procurement Plan – R.20-05-003](#)

Background:

R.20-05-003 was the predecessor proceeding to R.25-06-019. It remains open for purposes of considering a staff proposal on the Reliable and Clean Power Procurement Program (RCPPP) framework, as was initially proposed in the April 25, 2025, Administrative Law Judge’s Ruling. The RCPMP framework seeks to provide clarity and predictability with procurement requirements for CPUC-jurisdictional load-serving entities (LSEs). This initial CPUC proposal provided two different options for the RCPMP. Option 1 would enable LSEs to comply with their allocated share of the statewide need for new energy capacity using new or existing resources. Option 2 would only enable new resources to meet compliance requirements.

Update:

On June 23, 2026, the CPUC released a Ruling advancing an additional proposal (“Option 3”) for the RCPMP. The proposal would develop new resource procurement requirements based on the preferred system plan portfolio created by aggregating individual LSE IRP filings with an additional buffer. Option 3 would entail resource-specific or attribute-specific procurement requirements, limiting the flexibility LSEs have to meet their required procurement.

OCPA supported the development of CalCCA’s comments on Option 3 for the RCPMP, which were submitted on August 14, 2026. These comments expressed concern about Option 3 because it would prescribe specific technologies or types of technologies for LSEs to procure. While these specific technologies may appear to be the most cost-effective solutions to achieve reliability and clean energy targets at the time of setting the requirement, market dynamics could be very different and/or evolve by the time LSEs ultimately procure these resources. A rigid compliance framework such as Option 3 will increase market power for sellers at the expense of affordability for all ratepayers who receive power from CPUC-jurisdictional LSEs (i.e., IOUs, CCAs, and Energy Service Providers (ESPs)).

Accordingly, CalCCA’s comments recommended the CPUC adopt Option 1 or a modified version of Option 2. Reply comments are due on September 2, 2026.

[Climate Credit – R.25-07-013](#)

Background:

This OIR was opened on July 24, 2025, to improve the California Climate Credit (Climate Credit). The Climate Credit has historically provided residential and small business customers with semi-annual bill credits using a portion of revenues from the

California Cap-and-Trade Program. In 2026, the annual credit amount is \$72 for OCPA's residential and small business customers. The CPUC opened the proceeding to further address affordability and support the California Industry Assistance, which is intended to prevent businesses from relocating to other states without emissions-compliance programs.

On April 30, 2026, the CPUC issued D.26-04-036, which requires the IOUs to distribute the residential credit in August and September due to these being two of the highest bill months for typical customers throughout California.² It also requires the IOUs to update messaging on their websites with this info, put messaging on-bill during these months that lists the amount of savings and attributes those savings to the Climate Credit and the Cap-and-Invest Program. OCPA published a blog post informing its customers of the changes to the Climate Credit in 2026.

OCPA aims to support modifications to the Climate Credit that are competitively neutral, including eligibility criteria and customer messaging, while ensuring that existing customers continue receiving the Climate Credit.

Update:

On June 29, 2026, the CPUC issued a ruling to provide guidance and direction for Phase 1B of the Climate Credit proceeding and set the procedural schedule for Phase 1B. OCPA supported CalCCA in the development of its Opening Comments on the CPUC's Phase 1B Ruling; these were submitted on July 24. CalCCA's Opening Comments argued that the CPUC should retain the status quo of an equal, non-volumetric electric Climate Credit for residential customers. However, if the CPUC has decided that it will make changes to the methodology to enhance the incentive for customers who need it the most, CalCCA proposed an alternative proposal that would provide a simple credit multiplier for customers enrolled in the California Alternative Rates for Energy (CARE) and/or Family Electric Rate Assistance (FERA) programs. This proposal would be simpler to implement than the other proposals the CPUC has discussed (e.g., a volumetric climate credit, a climate credit that differs by climate zone) and would minimize the impact felt by low-income customers who are just outside the threshold for an elevated climate credit.

The CPUC held a workshop on August 11, 2026, to discuss its Climate Credit proposal concepts and any additional party proposals. CalCCA asserted that it prefers to maintain the status quo for the climate credit, as well as its alternative proposal to implement a simple credit multiplier for CARE and/or FERA customers.

² See <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M605/K990/605990203.PDF>

Electric Tariff Rule 17 Application

Background:

SCE's Electric Tariff Rule 17 ("Rule 17") governs the way SCE can recover under- and over-collections of bills. SCE can issue an adjusted bill for the undercharge and must issue a refund or credit to the customer for the overcharge. The amended charge cannot exceed three years for commercial customers and cannot exceed three months for residential or small business customers. This rule protects customers from significant rate shocks due to errors with SCE's billing system and provides sufficient incentive for SCE to maintain an accurate and reliable system.

Currently, both IOU and CCA customers (and some ESP customers) pay for these billing errors.

Update:

On June 22, 2026, Southern California Edison (SCE), Pacific Gas & Electric (PG&E), and San Diego Gas & Electric (SDG&E), collectively the Joint IOUs, filed an application proposing that LSEs should pay for under-collections resulting from Rule 17 back-billing limits.

On July 30, 2026, CalCCA filed a Protest to the Application from the Joint IOUs. While CalCCA supports the proposed tracking of billing errors included in the Application, it strongly opposes the proposal for LSE-funded undercollections. The Joint IOUs view these undercollections as a "cost of doing business," but CalCCA disagrees because CCAs do not have the statutory right to change vendors for billing provider services and should not be burdened with costs that are entirely outside of their control. Because these errors are a result of suboptimal performance from IOU systems, the financial consequences should be used to recover costs from Rule 17 undercollections. Such a proposal would provide sufficient incentive for the IOUs to minimize these errors and would better align with cost causation principles. Both the City of Cerritos and Cal Advocates also submitted protests to the Application of the Joint IOUs.

California Air Resources Board Updates

Cap and Investment Program

Background: The California Air Resources Board (CARB) introduced the RPS Adjustment into the Cap-and-Invest regulation in 2010. The RPS Adjustment reduces the Cap-and-Invest program compliance obligations for PCC-2 RECs based on the quantity of MWh procured from eligible renewable energy resources that were not directly delivered to California. PCC-2 RECs are bundled RPS products where the renewable energy itself isn't directly scheduled into a California balancing authority but

is instead "firmed and shaped" by pairing it with an equivalent quantity of substitute (typically non-renewable) energy that is delivered into a California balancing authority.

On April 14, 2026, CARB released an amended regulation to the RPS adjustment that would effectively accelerate sunseting the provision from the end of 2030 to the end of 2026. Such an amendment would render PCC-2 RECs uneconomic and would likely drive up the costs of RPS compliance for LSEs from 2027 to 2030. CalCCA filed comments on May 4, 2026, which requested a carveout for the sunseting of the RPS Adjustment for contracts for PCC-2 RECs that were signed prior to the release of the amendments on April 14, 2026.

[Update:](#)

On May 28, 2026, CARB held a public hearing to consider the regulation change. The public hearing resulted in some updates to the regulation, but CARB did not elect to create a carveout as CalCCA's comments requested. The CARB board approved the regulation changes on May 29, 2026, and filed a Notice of Determination on June 3, 2026.

The approved regulation changes were submitted to the Office of Administrative Law (OAL) on July 14, 2026. The OAL has until August 25, 2026, to approve or reject the Regulation Order.

Federal Energy Regulatory Commission Updates

[Large Loads: Advanced Notice of Proposed Rulemaking](#)

[Background:](#)

On October 23, 2025, the Secretary of Energy released an Advanced Notice of Proposed Rulemaking (ANOPR) related to large loads. The ANOPR directed the Federal Energy Regulatory Commission (FERC) to consider "potential reforms to ensure the timely and orderly interconnection of large loads to the transmission system." There are concerns that this rulemaking could encroach on areas that have traditionally fallen within the states' primary jurisdiction. Historically, FERC has declined to assert jurisdiction over interconnections, which, along with retail service terms, cost allocation, and resource planning for load growth, have long been within the purview of state regulators under Section 201(b) of the Federal Power Act.

FERC noted that it will act on this docket by the end of June 2026, as stated in a FERC order issued on April 16, 2026. FERC does not intend this anticipated decision to discourage public utilities from making separate filings to address large load issues.

Update:

On June 18, 2026, FERC issued six Orders to Show Cause (show-cause orders) initiating proceedings under the Federal Power Act to all jurisdictional regional transmission organizations (RTOs) and transmission owners (TOs), following a directive of the U.S. Department of Energy (DOE). The orders instruct the RTOs and TOs to describe why their existing transmission tariffs are fair and reasonable for the interconnection of large loads or explain what tariff changes would remedy FERC's concerns. For California, this show-cause order was submitted to the CAISO, and its response is due on August 17, 2026. On August 3, 2026, CAISO submitted a Motion for Abeyance, requesting a 90-day extension to reply to the show-cause order. CAISO cited, among other things, the need to coordinate with state regulators who continue to work to protect electricity customers from cost shifts, as referenced in the show-cause order. OCPA will continue to monitor this proceeding and watch for any changes that will impact its customers or operations.

FISCAL IMPACT

None.

ATTACHMENT(S)

None.

ORANGE COUNTY POWER AUTHORITY

Staff Report – Item 8.3

To: Orange County Power Authority Regulatory and Legislative Committee
From: Frank Harris, Regulatory and Legislative Manager
Approved by: Joe Mosca, Chief Executive Officer
Subject: CalCCA UPDATE
Date: August 27, 2026

STRATEGIC GOALS

- ☐ Enrich & Grow the OCPA Community
- ☐ Prioritize Fiscal Sustainability & Affordability
- ☐ Design & Deploy Community-Aligned Customer Programs
- ☐ Energize Our Community with Renewable Energy Sources
- ☒ Raise Awareness of Community Energy & Advocate for Our Customers
- ☐ Not Applicable

RECOMMENDED ACTION(S)

Receive and file.

BACKGROUND

Founded in 2016, California Community Choice Association (CalCCA) is the statewide trade association for California's Community Choice Aggregators (CCAs). With 24 CCA members, CalCCA provides a collective forum for legislative advocacy, regulatory engagement, best-practice exchange, and public education.

CalCCA staff includes experts in electricity markets, law, regulatory advocacy and case management, data analysis, legislative affairs, and customer programs. It has established 18 membership committees and discussion groups to develop regulatory, legislative, and legal strategies and share best practices.

Through our membership, CalCCA helps Orange County Power Authority (OCPA) influence policies that directly affect rate design, resource adequacy, reliability obligations, decarbonization compliance, and customer program development. Through its membership with CalCCA, OCPA has gained a structured platform for collaboration

and representation. As such, CalCCA helps OCPA leverage its staff's expertise to gain influence over California electricity policy.

DISCUSSION / ANALYSIS

Core Benefits of CalCCA

- **Policy and Regulatory Advocacy**
California's energy policy evolves quickly, and individual agencies often have limited staff capacity to monitor every proceeding, filing, workshop, and legislative development. CalCCA helps members track issues early, coordinate positions, and present more persuasive arguments through a unified industry voice.
- **Operational and Strategic Collaboration**
Membership creates direct access to peers confronting similar challenges in procurement, integrated resource planning, customer programs, data management, rate strategy, communications, and compliance. This exchange can shorten learning curves and improve decision quality.
- **Credibility and Visibility**
Participation in the primary statewide CCA association signals seriousness, engagement, and commitment to sector-wide problem solving. That visibility can matter with regulators, counterparties, local government partners, and community stakeholders.
- **Shared Intelligence**
California energy markets are complex and often change timelines that strain individual agency capacity. Shared intelligence on compliance, market reform, procurement requirements, and litigation-sensitive topics can reduce avoidable risk and improve readiness.

Practical Benefits for OCPA

- Earlier awareness of regulatory and legislative developments
- Coordinated input on regulatory and legislative matters
- Access to subject-matter peer networks across California CCAs
- Opportunities to help shape statewide CCA narratives and priorities
- Shared perspectives on procurement, reliability, affordability, and decarbonization strategy
- Operational efficiencies gained by not duplicating every advocacy and issue management effort internally

How Membership Supports OCPA's Mission

To best serve its 24 member agencies, CalCCA has established various Committees, Discussion Groups, and Tiger Teams, each focused on specific issues affecting CCA communities.

Staff Committees

- Regulatory Committee
- Legislative Committee
- Marketing and Communications Committee
- Billing Operations and Customer Care Committee
- Procurement Committee
- General Counsel Committee
- Equity Committee
- Compliance Committee
- Modeling Committee
- Model Practices Committee
- Programs Committee

Discussion Groups

- Directors Open Forum Discussion Group
- Federal Policy Discussion Group
- Risk Management Discussion Group
- Regulatory Directors Discussion Group
- Board Clerks Discussion Group
- Human Resources Discussion Group
- Data Analytics Discussion Group

Tiger Teams

- RA Tiger Team
- Diablo Canyon Joint Tiger Team
- Large Loads Tiger Team
- PCIA Tiger Team
- Integrated Energy Policy Report Tiger Team
- Autonomy Tiger Team
- Infrastructure Tiger Team
- Programs Tiger Team
- Integrated Resource Plan Tiger Team
- Infrastructure Tiger Team

Board of Directors

- Comprised of the Chief Executive Officers of 16 CalCCA member agencies.
- Joe Mosca serves on behalf of OCPA.

Executive Committee

- Comprised of eight members of the CalCCA Board of Directors.
- Joe Mosca serves on behalf of OCPA.

CalCCA's Regulatory Actions Protecting the Interests of OCPA Customers

A key part of CalCCA's value proposition is the work in the California regulatory arena. While its primary efforts focus on CPUC regulatory activities, CalCCA also addresses regulatory actions by the California Energy Commission, the California Air Resources Board, and the California Independent System Operator. CalCCA has identified over \$1.9B in cost savings through advocacy efforts in the past year. These savings protect OCPA member communities from costly policy changes.

CalCCA's regulatory successes in 2025 include:

- a. Blocked a request by the Investor-Owned Utilities (IOUs) to modify the 2025 Renewable Portfolio Standard (RPS) Market Price Benchmark (MPB) methodology in the Power Charge Indifference Assessment (PCIA) Track One scope. Keeping the IOU proposal to modify the RPS MPB methodology to incorporate a five-year average of transactions would have increased 2025 indifference amounts.
- b. No new procurement ordered in Aliso Canyon proceedings, resulting in 2,000 MW of procurement that was rejected due to actions by CalCCA.
- c. Through its influence on the Resource Adequacy (RA) counting rules, CalCCA reduced RA requirements for CCAs, identifying an additional 800 MW per month for summer with the value at the benchmark.
- d. Led to the rejection of potential increases in the 2025 Planning Reserve Margin (PRM). This reduced the RA requirement by 500 MW over the summer.
- e. CalCCA identified a CPUC calculation error, resulting in a 1.5% reduction in the 2026 PRM. This led to a 270 MW reduction in RA requirements for CCAs.

CalCCA's Legislative Actions Protecting the Interests of OCPA Customers

CalCCA coordinates with member CCAs, including OCPA, to lead legislative efforts to protect California's CCA customers. During the current legislative session, CalCCA has sponsored two bills and engaged on multiple others to reduce CCA customer cost burdens, protect CCA autonomy, and advance common-sense legislative approaches in the energy arena.

When sponsoring a bill, the primary focus is to implement a statutory change that is consistent with the interests of member communities. But sponsoring a bill can also prompt long-term regulatory change that protects CCA customers' interests, even if the bill does not become law. In the 2026 legislative session, CalCCA sponsored two bills focused on affordability and cost fairness.

- f. Senate Bill (SB) 1138 (Padilla) would require the CPUC to authorize a load-serving entity (LSE) to demonstrate compliance with RA requirements by making transactions with other LSEs to most efficiently acquire needed reliability resources. While this bill recently failed in the Assembly Appropriations Committee, its success in moving through the full Senate and then the Assembly Utilities and Energy Committee demonstrates the legislature's interest in promoting affordability in the electricity sector.
- g. Assembly Bill 1761 (Rogers) would require the CPUC to require an IOU, member association, LSE, or other party, in submitting a proposal or analysis for the determination or application of a calculation methodology for any nonbypassable charge imposed on customers of an LSE to recover costs associated with contracts, electrical corporation-owned generation, or any other resource or value included in that charge and any other charge derived from those costs, to make all data serving as a basis for that proposal or analysis available to load-serving entities and ratepayer advocates on behalf of customers. The goal of AB 1761 is to ensure that all CCAs have full access to the data used to determine the PCIA. The bill has moved through the Assembly and both Senate Committees and was recently ordered to a third reading. Once read a third time on the Assembly floor, the full Assembly can vote on the bill. If passed and signed by the Governor, AB 1761 will facilitate more objective forecasting and analysis of potential PCIA costs.

Conclusion

CCAs are, at their core, community service organizations. CalCCA supports its members, including OCPA, by providing resources that help them leverage staff efforts and best serve their local communities.

FISCAL IMPACT

None.

ATTACHMENT(S)

None.