



June 2, 2025

**VIA ELECTRONIC MAIL**

Public Utilities Commission of the State of California  
Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue, 4th Floor  
San Francisco, CA 94102

**MCE Advice Letter No. 88-E**

**RE: Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource  
Procurement Compliance Deadline Pursuant to D.24-02-047**

**[PUBLIC VERSION]**

**PURPOSE**

Pursuant to Decision (“D.”) 24-02-047, Marin Clean Energy (“MCE”) submits this Tier 2 Advice Letter (“AL”) to request that Energy Division approve an extension of MCE’s procurement compliance deadline for long lead-time (“LLT”) resources, as required by D.21-06-035 and D.23-02-040, from June 1, 2028 to June 1, 2031.

**TIER DESIGNATION**

Pursuant to OP 16 of D.24-02-044, MCE hereby submits this AL with a Tier 2 designation.

**EFFECTIVE DATE**

MCE requests that this Tier 2 AL becomes effective July 2, 2025, which is 30 days following submittal.

**BACKGROUND**

In D.21-06-035, MCE was assigned a Long Lead Time (“LLT”) procurement obligation of 58 MW. This requirement consisted of 29 MW of long duration storage (“LDS”) capacity and 29 MW of clean-firm capacity. In D.24-02-047, the Commission authorized load-serving entities (“LSEs”) to seek an extension of the deadline to meet the LLT procurement compliance requirement as defined by D.21-06-035 and D.23-02-040. Specifically, the D.24-02-047 provides that:

All load-serving entities subject to requirements of Decision (D.) 21-06-035 and D.23-02-040 to procure long lead-time (LLT) resources shall provide, by no later than June 1, 2025 either of the following (or a combination of each):

(a) A set of signed contracts that meet their LLT obligations, to be included in the June 1, 2025 procurement data filing required by D.22-05-015;

(b) A Tier 2 advice letter seeking an extension based on LLT cost considerations or projects with later commercial online dates, including signed or proposed contracts with projects with contract online dates up to June 1, 2031, and including confidential pricing and bid data to substantiate the basis for the request.<sup>1</sup>

Consistent with this direction, MCE requests an extension to meet the procurement deadline for LLT resources, as defined by D.21-06-035 and D.23-02-040 from June 1, 2028 to June 1, 2031, as detailed below.

## **DISCUSSION**

In response to the procurement directives in D.21-06-035 and D.23-02-040, MCE executed a long-term Energy Storage Service Agreement (“ESSA”) to meet its full LDS capacity requirement. This project is on course for a Commercial Operation Date (“COD”) consistent with the June 1, 2028 deadline. MCE is not requesting an extension for the LLT LDS compliance deadline at this time. MCE is requesting additional time to procure capacity to meet its 29 MW clean-firm capacity requirement in accordance with Ordering Paragraph 16(b) of D.24-02-047. This AL is accompanied by a confidential supporting declaration from an authorized representative of MCE providing additional detail supporting this request and describing MCE’s procurement efforts to date to justify MCE’s requested extension to June 1, 2031.

## **REQUEST FOR CONFIDENTIAL TREATMENT**

This AL contains market-sensitive information regarding MCE’s MTR procurement efforts. MCE requests that the redacted information, which contains confidential, market-sensitive information in support of this AL, including information related to MCE’s open procurement position and other information specifically protected under D.06-06-066, D.08-04-023, D.20-07-005, D.21-11-029, and California Government Code Section 7922.000, be kept confidential by the Commission and not be disclosed by the Commission to any other person or entity. The basis for this request for confidential treatment is provided in the Confidentiality Declaration, included herein as Attachment C.

## **ATTACHMENTS**

The following attachments are included as part of this AL:

- **Attachment A:** *Declaration of Vicken Kasarjian, MCE Chief Operations Officer, Supporting Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047* [REDACTED]
- **Attachment B:** Executed LLT Contracts [REDACTED]

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<sup>1</sup> D.24-02-047 at 140, OP 16.

- **Attachment C:** *Declaration of Vicken Kasarjian Supporting Confidentiality Claim for Submission of MCE's Advice Letter 88-E, Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047*

## **CONCLUSION**

MCE respectfully requests that Energy Division approve the extension of MCE's LLT resource procurement deadline from June 1, 2028 to June 1, 2031.

## **NOTICE**

Anyone wishing to protest this advice letter may do so only by electronic mail. Protests must be received no later than 20 days after the date of this advice letter. Protests should be submitted to the CPUC Energy Division at:

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

In addition, protests and all other correspondence regarding this AL should be sent by electronic mail to the attention of:

Troy Nordquist  
Marin Clean Energy  
Compliance and Grants Manager  
[tnordquist@mcecleanenergy.org](mailto:tnordquist@mcecleanenergy.org)

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

A copy of this advice letter is being sent by electronic mail to each party of record in the official service list for Rulemaking 20-05-003. For changes to this service list, please contact the Commission's Process Office at (415) 703-2021, or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

## **CORRESPONDENCE**

For questions, please contact Troy Nordquist at (925) 378-6767 or by electronic mail at [tnordquist@mcecleanenergy.org](mailto:tnordquist@mcecleanenergy.org).

Respectfully,

/s/ Nathaniel Malcolm  
Senior Commercial Counsel  
Marin Clean Energy

cc via email:

Energy Division Tariff Unit ([edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov))  
Service List: R.20-05-003

**ATTACHMENT A**

***Declaration of Vicken Kasarjian, Chief Operations Officer, Supporting Request of  
MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement  
Compliance Deadline Pursuant to D.24-02-047***

**[REDACTED]**

**ATTACHMENT B**

**Executed LLT Contracts**

**[REDACTED]**

**ATTACHMENT C**

***Declaration of Vicken Kasarjian Supporting Confidentiality Claim for  
Submission of MCE's Advice Letter 88-E,  
Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource  
Procurement Compliance Deadline  
Pursuant to D.24-02-047***