



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: **Marin Clean Energy ("MCE")**

Utility type:
 ELC GAS WATER
 PLC HEAT

Contact Person: Nathaniel Malcom
Phone #: (415) 464-6048
E-mail: nmalcom@mcecleanenergy.org
E-mail Disposition Notice to: nmalcom@mcecleanenergy.org

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)
October 28, 2025

Advice Letter (AL) #: **88-E-A**

Tier Designation: **2**

Subject of AL:

Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.24-02-047, D.21-06-035, and D.23-02-040

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information: Compliance & procurement positions
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: **11/27/25**

No. of tariff sheets:

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Nathaniel Malcom
Title: Senior Commercial Counsel
Utility Entity Name: Marin Clean Energy
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx: (415) 464-6048
Facsimile (xxx) xxx-xxxx:
Email: nmalcom@mcecleanenergy.org

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	



October 28, 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-A

RE: Supplement to MCE Advice Letter No. 88-E 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

Marin Clean Energy (“MCE”) submits this supplemental Tier 2 Advice Letter No. 88-E-A (“Supplemental AL”) to address clarifications to MCE Advice Letter No. 88-E requested by the California Public Utilities Commission (“Commission”) Energy Division staff. Specifically, this Supplemental AL clarifies MCE’s request made in Advice Letter 88-E to be a request for Energy Division to approve an extension of MCE’s compliance deadline under Ordering Paragraph (“OP”) 16(b) of Decision (“D.”) 24-02-047 from June 1, 2025 to June 1, 2028 to provide signed contracts for a portion of long lead-time (“LLT”) mid-term reliability (“MTR”) resources intended to meet MCE’s LLT clean-firm procurement requirement.

TIER DESIGNATION

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

EFFECTIVE DATE

MCE requests that this Tier 2 Supplemental AL become effective no later than November 27, 2025.

BACKGROUND

In accordance with OP 16 of D.24-02-047 MCE submitted Advice Letter 88-E on June 2, 2025. Advice Letter 88-E requested an extension of the deadline to meet compliance requirements as defined under OP 16 of D.24-02-047 for a portion of MCE’s MTR LLT clean-firm procurement requirement. MCE received an *Advice Letter Suspension Notice* on June 30, 2025 that suspended Advice Letter 88-E for up to 120 days indicating the “Advice Letter Requires Staff Review.” On September 26, 2025, Energy Division staff

requested clarification from MCE on MCE's request in Advice Letter 88-E. MCE provided Energy Division staff written clarification on September 30, 2025 followed by a teleconference meeting with Energy Division staff on October 15, 2025 to clarify the scope of MCE's request under Advice Letter 88-E.

Consistent with the consultation with Energy Division staff on October 15, 2025, MCE is clarifying its initial request in Advice Letter 88-E to be a request, pursuant to OP 16(b) of D.24-02-047, for an extension from June 1, 2025 to June 1, 2028 to provide the Commission signed contracts for a portion of its MTR LLT procurement compliance requirement as defined by D.21-06-035 and D.23-02-040.

DISCUSSION

Consistent with the discussion and clarification required by Energy Division staff on October 15, 2025, MCE is requesting additional time to procure capacity and provide eligible contracts to the Commission to meet a portion of its clean-firm capacity requirement in accordance with Ordering Paragraph 16(b) of D.24-02-047. This Advice Letter is accompanied by an amended 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, 2028.

REQUEST FOR CONFIDENTIAL TREATMENT

This Supplemental 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 Supplemental 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 B.

ATTACHMENTS

The following attachments are included as part of this Supplemental AL:

- **Attachment A:** *Amended 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* [CONFIDENTIAL]
- **Attachment B:** *Declaration of Vicken Kasarjian Supporting Confidentiality Claim for Submission of MCE Advice Letter 88-E-A, Supplement to MCE Advice Letter No. 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 time for MCE to provide contracts supporting a portion of MCE's LLT resource procurement until June 1, 2028.

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

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

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.

CORRESPONDENCE

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

Respectfully,

/s/ Nathaniel Malcolm
Senior Commercial Counsel
Marin Clean Energy

cc via email:

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

ATTACHMENT A

Amended 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

***Declaration of Vicken Kasarjian Supporting Confidentiality Claim for
Submission of MCE Advice Letter No. 88-E-A, Supplement to MCE Advice Letter No.
88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource
Procurement Compliance Deadline
Pursuant to D.24-02-047***

Declaration of Vicken Kasarjian Supporting Confidentiality Claim for Submission of MCE Advice Letter No. 88-E-A, Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047

In accordance with General Order 66-D, Decision (“D.”) 06-06-066, D.08-04-023, D.20-07-005, and D.21-11-029, for the submission of confidential information to the California Public Utilities Commission (“Commission”) in an Advice Letter filing, Marin Clean Energy (“MCE”), submits the following declaration in support of its claim of confidentiality for the below-specified information provided in MCE Advice Letter No. 88-E-A, *Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047* (“MCE AL 88-E-A”) and the supporting document Confidential Attachment A.

The undersigned declares, under penalty of perjury, as follows:

1. I am the Chief Operations Officer for MCE. In this capacity, I have knowledge of the information provided in this declaration and am authorized to make this declaration on MCE’s behalf.
2. In this Advice Letter Submission, MCE is securely and confidentially uploading the following documents to the Energy Division through the Commission’s File Transfer Protocol (“FTP”) system (“Confidential Version”):
 - a. “MCE Advice Letter No. 88-E-A, Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047”
 - b. “Attachment A – Amended 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 [CONFIDENTIAL]”
 - c. “Attachment B – Declaration of Vicken Kasarjian Supporting Confidentiality Claim for Submission of MCE Advice Letter 88-E-A, Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047”

3. In this Advice Letter Submission, MCE is publicly submitting the following documents to the Energy Division and the service list for the current Integrated Resource Planning Rulemaking, R.20-05-003, via email (“Public Version”):
 - a. “MCE Advice Letter No. 88-E-A, Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047 [PUBLIC VERSION]”
 - b. “Attachment A – Amended 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]”
 - c. “Attachment B – Declaration of Vicken Kasarjian Supporting Confidentiality Claim for Submission of MCE Advice Letter No. 88-E-A, Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047”
4. Through this declaration, MCE requests that the Confidential Version be treated as confidential and kept under seal.
5. This request for confidentiality is being made pursuant to the requirements and authority of Commission Decisions 06-06-066, 08-04-023, 20-07-005, and 21-11-029, Commission General Order 66-D, and California Government Code Section 7922.000.
6. The attached “Table of Confidential Information” identifies the specific information that is subject to this confidentiality request, provides specific citations to the authority upon which each request is based, provides a granular justification for confidential treatment, and specifies the length of time that the information is to be kept confidential.
7. MCE is complying with the limitations on confidentiality specified in the D.06-06-066 Matrix (as amended by subsequent decisions) for the types of data being submitted subject to a request for confidentiality.
8. To the best of my knowledge, the information being submitted subject to this request for confidentiality is not already public.

9. MCE is providing a Public Version of MCE AL 88-E-A and associated attachments and is separately providing confidential information in the Confidential Version of MCE AL 88-E-A and associated attachments to the Commission.
10. The following person is designated as the person for the Commission to contact regarding potential release of this information by the Commission:

Troy Nordquist
Marin Clean Energy
Compliance and Grants Manager
tnordquist@mcecleanenergy.org

Executed on October 28, 2025, at San Rafael, California

 /s/ Vicken Kasarjian

Vicken Kasarjian
Marin Clean Energy
Chief Operations Officer
vkasarjian@mcecleanenergy.org

TABLE OF CONFIDENTIAL INFORMATION
MCE Advice Letter No. 88-E-A, Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047

Redaction Reference	Authority For Confidentiality Request	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
<p>Redactions to <i>MCE Advice Letter No. 88-E-A, Supplement to MCE Advice Letter No. 88-E Request of MCE for Extension of Mid-Term Reliability Long Lead Time Resource Procurement Compliance Deadline Pursuant to D.24-02-047</i></p> <p>Redactions to Attachment A - <i>Amended 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</i></p> <p>REDACTED IN ITS ENTIRETY</p>	<p>CCA/ESP Matrix,</p> <ul style="list-style-type: none"> • Item II(A) – Load Forecast Information and Data • Item II(B) – RA Supply Data • Item III(B) – LSE Total Peak Load Forecast • Item IV(C) – Bilateral Contracts <p>Government Code, Section 7927.705; Evidence Code, Section 1060 (see also Civil Code Section 3426.1)</p> <p>California Government Code, Section 7922.000</p>	<p>The redacted information includes sensitive data derived from MCE’s allocations of Mid-Term Reliability (“MTR”) obligations that speak to MCE’s compliance positions and procurement needs at a level of granularly not reflected in the overall MTR allocation. The redacted text also describes MCE’s procurement efforts to comply with the MTR Long Lead Time (“LLT”) compliance requirement and specifically, information regarding MCE’s contract administration efforts relating to contracts MCE is relying on for its MTR LLT obligation. As such, the Declaration of Vicken Kasarjian, and supporting attachments are redacted in their entirety because revealing the identity of certain contract administration details, counterparties, entities, project names, procurement strategies, and procurement efforts would reveal sensitive information. Thus, the contracts and declaration cannot be redacted.</p> <p>The state of MCE’s contract administration and MCE’s resulting MTR LLT compliance need is highly sensitive, and its public release could have negative impacts on both project developers, MCE, the market, and ratepayers. MCE requests that the full Attachment A be protected as redacted because providing the redacted information publicly would force MCE to reveal confidential information obtained from third-party developers. The public</p>	<p>Under Item II(B), RA Supply Data is confidential for the first three years of the forecast period.</p> <p>Under Item IV(C), Bilateral Contract, “other terms” are protected for three years from the start date of deliveries or one year following expiration.</p> <p>Given the market sensitivity of information contained in the Declaration of Vicken Kasarjian, MCE requests the Commission not disclose this information further to any person or entity as disclosure would reveal sensitive strategic and market information, disclosure of which could have negative impacts on</p>

		<p>interest disfavors requiring load serving entities to disclose the confidential information of third parties, as doing so may expose LSEs to contractual liability and has the potential to disrupt energy markets and market positions.</p> <p>Additionally, the redacted information describes MCE's efforts to optimize its MTR portfolio, which includes confidential information regarding communications with market participants, as well as offers, bids, and pricing information. The release of this information would reveal MCE practices and procurement strategies, could be used to reveal or to derive MCE's net short RA position or other market-sensitive information. This information is not generally known and could be used by others to gain economic value from its disclosure, which would impact MCE's negotiating positions and the energy and capacity market more generally. The public interest in maintaining fair and functional markets by protecting this information outweighs any negligible public interest in publicly disclosing this information.</p> <p>Finally, the redacted information directly relates to ongoing contract negotiations, and the public interest in protecting confidential contract negotiations vastly outweighs any conceivable benefit from public disclosure of such information.</p>	<p>MCE, the market, and ratepayers.</p>
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