BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes.	Rulemaking 20-05-003

CALIFORNIA WIND ENERGY ASSOCIATION REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON NEED AND PROCESS FOR CENTRALIZED PROCUREMENT OF SPECIFIED LONG LEAD-TIME RESOURCES

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On behalf of the California Wind Energy Association

June 5, 2024

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I. INTRODUCTION AND SUMMARY

Pursuant to the *Ruling Seeking Comments on Need and Process for Centralized Procurement of Specified Long Lead-Time Resources* ("Ruling") issued by Administrative Law Judge Julie Fitch on April 26, 2024, the California Wind Energy Association ("CalWEA") provides these reply comments in response to parties' May 24, 2024, opening comments.[1]

In summary, these reply comments make the following points:

- Most parties agree that offshore wind warrants central procurement;
- Despite recognition that OSW is appropriate for central procurement, many parties overlook market failures;
- Market transformation is an appropriate criterion for central procurement;

[1] CalWEA responds to the opening comments of: American Clean Power - California ("ACP-California"); California Community Choice Association ("CalCCA"); California Community Power ("CC Power"); California Environmental Justice Alliance and Sierra Club ("CEJA-Sierra Club"); Coalition of California Utility Employees and California Unions for Reliable Energy ("CUE/CURE"); Environmental Defense Fund ("EDF"); Large-scale Solar Association ("LSA"); Pacific Gas & Electric Company ("PG&E"); Offshore Wind California; the Public Advocates Office at the California Public Utilities Commission ("Cal Advocates"); San Diego Gas & Electric Company ("SDG&E"); Solar Energy Industries Association ("SEIA"); Southern California Edison Company ("SCE"); and the Utility Reform Network ("TURN"). All references are to parties' May 24, 2024, opening comments unless otherwise specified.

- The commission should not wait to see if load-serving entities ("LSE") procure offshore wind;
- Scale is critical to offshore wind;
- Offshore wind should not be procured at any cost, but cost caps are not the right approach;
- The CADEMO project can facilitate larger developments and inform associated risks;
- LSE self-procurement of OSW is not required or efficient;
- Centrally procured resource costs should be allocated under a 24-hourly reliability framework; and
- The net costs of centrally procured resources should be recovered as a public purpose program.

II. RESPONSES TO OPENING COMMENTS

A. Most Parties Agree that Offshore Wind Warrants Central Procurement

Most parties agree that offshore wind is the only resource that should be centrally procured or that central procurement is most justified or most urgently needed for offshore wind.[2]

CalWEA recommended that the "long lead time for transmission" criterion be expanded to "long lead time for transmission *and other infrastructure.*"[3] SEIA and CalCCA made similar recommendations. SEIA proposed adding a criterion that the new resource requires the development of "resource-specific common infrastructure" such as port facilities to develop an offshore wind industry.[4] CalCCA proposed a criterion requiring the development of "additional non-transmission infrastructure/unique transmission infrastructure."[5]

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[2] See, e.g., CalCCA at p. 14 ("Of all the resource types identified as potential candidates for central procurement, OSW is likely the most compatible with central procurement."); EDF at pp. 1 and 8 ("EDF suggests that the Commission prioritize offshore wind resources and then shortly thereafter consider centrally procuring geothermal and long duration energy storage resources. … due to the development cycle of offshore wind, action is needed on a sooner time horizon than the other two resources. … (offshore wind) benefits uniquely from capitalizing on economies of scale."); SEIA at p. 6 ("OSW is the only LLT resource that meets the criteria recommended above"). SCE at p. 14 ("only OSW is a resource that has yet to be contracted by LSEs in any material quantity.") TURN at p. 3 ("TURN supports the identified rationales in the Ruling for DWR centralized procurement of uncontracted resources such as OSW. In particular, TURN believes that successful OSW development will require an 'anchor tenant' like DWR that can make commitments at scale.")

[3] CalWEA at pp. 1 and 4.

[4] SEIA at p. 4.

[5] CalCCA at p. 12.

Regarding the other resources proposed as central-procurement candidates in the Ruling, CalWEA agrees with SCE that the Commission should not prematurely commit to centralized procurement of IRP resources before establishing the RCPPP and allowing LSEs and the market to respond."[6] As CalWEA noted in opening comments, the Commission has many regulatory tools available to promote desired resources (or attributes), including, in the RCPPP, mandating procurement of resources (or attributes) that are found to be cost-effective under expanded analyses of cost-effectiveness,[7] and coordinated planning with CAISO transmission planning and interconnection policies,[8] as noted also by CalCCA.[9] CC Power similarly observed that clean energy mandates, slice-of-day policies, and other policies can provide market signals.[10] Indeed, the Commission has already established specific mandates for "clean firm" resources and long-duration energy storage.[11]

B. Despite Recognition that OSW Is Appropriate for Central Procurement, Many Parties Overlook Market Failures

While most parties agree that offshore wind is appropriate for central procurement, many parties call for procurement of no more than 3 GW,[12] insufficiently recognizing the market barriers and failures that warrant more robust support.[13]

CalWEA explained why the disconnect between a system optimal portfolio – one that takes long-term risks into account – and individual-LSE procurement is a market failure that must be corrected by regulatory action.[14] For some resources, regulatory actions other than central procurement can address the problem. For other resources, procurement by individual LSEs could

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[6] SCE at p. 6.

[7] CalWEA at p. 5.

[8] *Ibid*.

[9] CalCCA at p. 10.

[10] CC Power at p. 8.

[11] Ruling at p. 24.

[12] See, e.g., Cal Advocates at p. 11; CalCCA at p. 17; LSA at p. 4: PG&E at p. 9; SEIA at p. 7; and SCE at p. 16.

[13] Some parties that disfavor central procurement of OSW do briefly acknowledge certain market failures and public goods. For example, CalCCA (at p. 24) states, "The central procurement of OSW may have some positive externalities, including lower subsequent costs for LSEs who procure such resources."

[14] CalWEA at response to Question 3, pp. 6-8 specifically.

be prevented by other market barriers, such as the mismatch between project size and the size of individual LSEs, the emerging nature of new technologies, long development lead times for necessary infrastructure other than transmission, and a limited number of sellers. Offshore wind falls in this category.

Nevertheless, many parties fail to recognize these fundamental issues. Cal Advocates, for example, focuses on those scenarios in the Ruling's analysis where OSW would not be cost-competitive with no apparent consideration of the *likelihood* of the scenarios where OSW would bring benefits.[15,16] CalWEA explained that we have *already experienced* such scenarios.[17] ACP-California appropriately calls for a broader set of scenarios that would evaluate the availability of regional imports, hydroelectric fleet operations, consumer trends in electrification. Cal Advocates itself notes that "the (hedge) value of energy-rich offshore wind … is not represented in the cost-benefit analysis."[18]

Contrary to SCE's argument that "[t]here is no need to have an alternative cost-benefit analysis for determining need,"[19] taking long-term risks into account is how the Commission can value resource diversity *as required by law*. As ACP-California noted, AB 1373 added the requirement for IRP to "maintain a diverse portfolio."[20] CalWEA strongly agrees with ACP-California that "[r]isk mitigation, like other insurance products, may well come at a premium on the 'base case' view of the future – but will avoid much higher costs in the many plausible alternative futures in which the insurance policy is needed" and – critically – that "it will be impossible for the state to 'catch up'" if a need for OSW is identified too late to enable the requisite infrastructure

[15] Cal Advocates at p. 9.

[16] EDF (at p. 8) also errs in stating that the cost-benefit analysis "demonstrates that development of 25 GW by 2045 does not provide net benefits, even under the most optimistic cost assumptions." In fact, as shown in Ruling analysis slide 24, three 2045 scenarios show benefits.

[17] CalWEA at p. 6.

[18] Cal Advocates at p. 9, footnote 22. "Specifically, offshore wind could present a partial physical hedge against future risks associated with energy insufficiency on the system – for example, the risk of demand response or other resource underperformance during summer extreme heat events, or of gas-fired generation curtailments in the event of a winter cold event that reduces gas supplies to California."

[19] SCE at p. 22. SCE's stance is perplexing given SCE's own corporate study documenting the benefits of a large role for OSW in meeting California's future needs. *See* SCE, *Countdown to 2045: Realizing California's Pathway to Net Zero* (Sept. 2023), and CalWEA's discussion of that study in opening comments at pp. 10-11.

[20] ACP-California at p. 5, referencing Section 454.52(a)(1)(J) of the Public Utilities Code.

development.[21]

One of the long-term risks is the increasing development challenges that land-based clean energy resources will face. Resource diversity will bring a significant reduction in the need for capacity overall, reducing the demand for land, as well as the associated environmental impacts.[22] Contrary to the assertion of Cal Advocates that central procurement of offshore wind "is not necessary for the IRP to achieve its statutory GHG reduction goals,"[23] in fact, by reducing the challenges associated with land-based resources, offshore wind may indeed be necessary to meet the state's GHG goals. TURN and CEJA-Sierra Club further argue that the Commission should recognize societal benefits, such as reduced land-use, themselves[24] (as distinct from the direct purview of the Commission to achieve SB 100 goals).[25]

In considering whether central procurement is warranted, Cal Advocates argues that the Ruling understated the ability of LSEs to source attributes from alternative resources and should allow only "a modest allowance for resource diversity benefits where alternative resources are already heavily represented in the PSP."[26] CalWEA explained why the availability of "alternative" or "substitute" resources is a flawed concept, given that a combination of several diverse resources may produce the most benefits and because all resources face development risks, thus pursuit of them all is necessary to substantially lessen those risks, thereby better ensuring achievement of SB 100 goals.[27]

C. Market Transformation Is an Appropriate Criterion for Central Procurement

Cal Advocates argues that market transformation should not be a criterion for central procurement, stating that "California ratepayers should not bear the brunt of the risks and costs

[21] ACP-California at p. 12.

[22] As CalWEA noted (at p. 10), 10 GW of offshore wind is likely to reduce total capacity needs by about 20 GW.

[23] Cal Advocates at p. 15.

[24] TURN at 3; CEJA-Sierra Club at p. 8.

[25] We note that, while Cal Advocates (at p. 23) suggests adding ports costs to the analysis of OSW, it does not congruously call for incorporating the indirect benefits of OSW, such as other potential uses of ports infrastructure and the well-paying jobs and economic benefits that come with it.

[26] Cal Advocates at p. 6

[27] CalWEA at pp. 3-4.

required for market transformation and emergent technology development."[28] As the Ruling noted,[29] solar photovoltaics and lithium-ion batteries also began as emerging technologies. While OSW may be a greater challenge than evolving solar and battery technologies were in meeting California's renewable energy goals, the challenge of meeting California's SB 100 goals is also greater. While there is "no certainty that higher ratepayer costs will lead to market transformation," there will also be opportunities to change course if DWR and the Commission are not convinced that cost trajectories are not being met, as discussed below.

D. The Commission Should Not Wait to See If LSEs Procure Offshore Wind

In reluctantly acknowledging that OSW may be the best (and only) candidate for central procurement, SCE argues that it is premature to conclude LSEs are "unable or unwilling" to procure any of the potential resource types identified in the Ruling. "Centralized procurement should be pursued only after LSEs have been unable to procure a necessary LLT clean energy resource and it is determined that a CPE could be successful where an LSE or group of LSEs could not be." SCE identified other types of barriers to individual LSE procurements, namely, supply chain delays, a difficult macroeconomic environment, and a congested interconnection queue, which would also apply to centralized procurement.[30] CalCCA similarly argues that "the lack of contracting with OSW is … because the OSW developers do not yet have complete information about their costs."[31]

While waiting to see if market issues resolve may be advisable in the case of the other resources identified, it is not advisable in the case of OSW. First, CalWEA articulated in opening comments that procurement of GW-scale offshore wind projects by individual LSEs would be inefficient for several reasons.[32] TURN and EDF made similar arguments that central procurement

[28] Cal Advocates at p. 4.

[29] Ruling at p. 20.

[30] SCE at p. 10.

[31] CalCCA at 4.

[32] CalWEA at p. 20. CalWEA argued that sole procurement will be more efficient for three reasons: a limited number of sellers in the market favors sole procurement by DWR to ensure competition; cost uncertainty and long lead-times favor cost-plus procurement where ratepayers will benefit from a single procurement entity gaining broader and deeper knowledge by managing all procurements; and GW-scale projects will be difficult for individual LSEs, or even a group of LSEs, to match to their loads.

will benefit ratepayers.[33,34] While the market and interconnection issues noted by SCE and CalCCA may resolve, it will remain inefficient for many LSEs to attempt to procure offshore wind. A central procurement entity will simply be better positioned to gain complete information and to monitor costs by procuring all OSW (at least initially) through cost-plus, open book contracting with all OSW suppliers.

Second, as discussed further below, it is essential that the Commission send a clear market signal to investors *now* for port and other infrastructure investments to be made in time to support mid-2030s OSW development.

Third, as parties have pointed out, DWR procurement brings additional opportunities for cost-savings through state-backed financing with lower interest rates.[35]

E. Scale Is Critical to Offshore Wind

Several parties call for a conservative approach to any central procurement, limiting central procurement to "an initial tranche" of as little as 1 GW of procurement.[36] Heeding these calls would doom offshore wind development.

First, the market failures and barriers discussed above are not likely to be solved after an "initial tranche" of OSW procurement, as suggested by CalCCA and others. As importantly, as argued by CUE/CURE,[37] finding a central procurement need that is too low (e.g. 1 to 3 GW) will not provide sufficient demand certainty to draw the necessary investment in ports, supply chains, workforce development. ACP-California further emphasizes that private equity investors evaluating the Humboldt port "are keenly watching how and whether California will provide greater certainty

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[33] TURN at p. 1-2 ("A major argument in favor of centralized procurement is the opportunity to use large volumes of aggregated demand to obtain more favorable pricing and terms for the buyer. Selling the entire output of a large project to a single centralized creditworthy buyer reduces risk to the developer, minimizes transaction costs, and can lead to lower overall pricing. Moreover, the absence of competing buyers under a central procurement model can place additional pressure on developers to offer cost-based (rather than opportunity cost-based) pricing…") and at p. 7 ("To promote process efficiency, the Commission should direct DWR to seek approval of multiple contracts in a single application.")

[34] EDF noted, at pp.7 and 12-13, that "the core purpose of DWR-led centralized procurement is to develop resources in a way that individual LSEs cannot…Failing to procure the entire potential capacity for an area at one time risks leaving potential capacity unused in the long term."

[35] CEJA-Sierra Club at p. 17; CUE/CURE at p. 1; EDF at p. 2; TURN at p.2.

[36] CalCCA at p. 23; SEIA at p. 7; SDG&E at p. 3; PG&E at p. 9.

[37] CUE/CURE at pp. 4-5.

on OSW project offtake as this is ultimately the pathway to return on investment for the port itself."[38] CalWEA underscores ACP-California's point that "identifying an OSW need that is too low "may compromise *any* commercial scale OSW in the state…OSW developers require a procurement signal of sufficient size to continue to put large quantities of capital at risk toward project maturation…. major supply chain entities need to see a sufficient supply of offtake contracts to plan for and direct their manufacturing capabilities to fulfill future equipment orders for California."[39]

Accordingly, as CUE/CURE, ACP-California, and Offshore Wind California also recommend, the Commission should identify a central procurement need that is large enough to create demand certainty and market transformation – 10 GW by 2035, which is consistent with the Energy Commission's established offshore wind development goal of 25 GW by 2045.

F. Offshore Wind Should Not Be Procured at Any Cost, But Cost Caps Are Not the Right Approach

Establishing a need for 10 GW of offshore wind procurement would not, as Cal Advocates fears, "lock" ratepayers into uneconomic contracts.[40] First, as CalWEA and ACP-California suggested, DWR would not contract for all 10 GW at once and could procure capacity over the next decade."[41] Second, as PG&E and others recommended , to avoid stranded costs, a cost-benefit analysis report should be prepared and included in DWR's submission to the Commission and prior to infrastructure development, which is likely 2-3 years from now.[42] CalWEA supports such a process provided that (a) expected costs are pegged to assumed long-term cost trajectories,[43] and (b) the cost analysis includes robust consideration of possible futures as was just begun in staff's analysis for the Ruling.

Cost caps, as suggested by SCE and SDG&E, would not be productive.[44] As stated by ACP-California, "[f]or emerging technologies like floating OSW and enhanced geothermal, costs are

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[38] ACP-California at p. 8.

[39] ACP-California at pp. 16-17.

[40] Cal Advocates at p. 9.

[41] ACP-California at p. 18; CalWEA at p. 12.

[42] PG&E at p. 6. Also see CalCCA at p. 5.

[43] See CalWEA at p. 16. CalCCA (at p. 17) also suggests that emergent technologies be compared to a declining cost model.

[44] SCE at p. 12; SDG&E at p. 12.

simply too uncertain to employ a prudent cap at this time." [45] The appropriate time for cost review is when the Commission reviews proposed contracts in view of a full package of current information.

G. The CADEMO Project Can Facilitate Larger Developments and Inform Associated Risks

CalWEA recommended that the Commission authorize DWR to procure the 60-MW CADEMO project if it is not procured by CCAs because of its value in advancing the "learning-by-doing" knowledge that can inform and help to resolve many practical challenges in developing OSW projects and will help DWR develop necessary knowledge of the offshore wind industry.[46] CADEMO could be online in late 2028 or 2029. CC Power likewise explained that it signed an MOU with CADEMO because "a smaller project, especially if available to operate sooner, could provide helpful information, including lessons on permitting, contracting, monitoring and safety, operations, interconnection, and other experiences" that "may enable more successful approaches to future projects while also further validating and demonstrating offshore wind in Western US coastal waters."[47]

PG&E stated that "it could be deemed prudent to have 2 years of operational data from the CADEMO pilot project or another demonstration project (to determine whether floating technology is feasible in California) prior to solicitation."[48] Commission staff also noted the value of CADEMO as a risk management strategy for offshore wind, stating that "pilot or demonstration projects can provide useful information on technology feasibility and risk. The 60 MW CADEMO floating offshore wind project may be a sufficient demonstration project for Morro Bay area and a pilot project may be useful before full-scale project development at Humboldt."[49]

H. LSE Self-Procurement of OSW is Not Required or Efficient

CalCCA argues that the Commission must provide a "mandatory six-month window" to allow load-serving entities ("LSEs") to self-procure eligible energy resources.[50] As a practical

[45] ACP-California at p. 29-30.
[46] CalWEA at pp. 14-16.
[47] CC Power at pp. 7-8.
[48] PG&E at p. 23.
[49] Ruling slide deck, slide 54.
[50] CalCCA at pp. 7-8.

matter, LSEs would not be able to self-procure offshore wind resources within six months from the Commission's "need" determination, which must be issued no later than September 1, 2024. CalCCA itself states that CCAs have not been able to contract for OSW resources because "the OSW developers are not ready to contract because they do not have complete information about their costs (e.g., floating platforms, supply chain, and lack of port infrastructure in California)."[51]

To the extent that CCAs may self-procure eligible energy resources, such procurement is still subject to a Commission finding that the proposed procurement will, among other things, "promote the *efficient* achievement of state energy policy objectives, including reductions in greenhouse gas emissions."[52] As CalWEA noted in opening comments, LSE self-procurement of gigawatt-scale OSW projects would be inefficient for many reasons, including: the limited number of sellers in the market, high degrees of cost uncertainty, long lead times, and an inability of LSEs to match the projects to their loads.[53] Given these challenges, the most efficient means of procuring large-scale OSW resources is through centralized procurement.

Further, there is no mandatory six-month window. Using legislative history, CalCCA misrepresents the "six month" language in AB 1373 as a mandatory minimum time frame that the Commission must wait before requesting DWR to act as the central procurement entity. The relevant statutory language says that "*[w]ithin six months* of determining that there is a need for the procurement of eligible energy resources, the commission may request the Department of Water Resources to exercise its central procurement function…"[54] The clear language of this statute sets an <u>outside</u> date by which the Commission may request DWR act as the CPE to contract for those resources, not an earliest date at which the Commission may do so.

First, the words of a statute govern over any legislative history. Legislative history is an aid for when the words of a statute are ambiguous, and unless there is ambiguity, courts do not consider legislative history in interpreting the meaning of a statute.[55] Here, the words of AB 1373 are clear. The Commission may request DWR to act as the CPE at any time within six months after identifying a need for that resource.

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[51] CalCCA Comments at p. 23.

[52] P.U. Code 454.51(d) (emphasis added).

[53] CalWEA at pp. 20-21.

[54] P.U. Code 454.52(a)(4)(C) (emphasis added).

[55] *California Teachers Assn. v. San Diego Community College Dist*. (1981) 28 Cal.3d 692, 698 ("Although a court may properly rely on extrinsic aids, it should first turn to the words of the statute to determine the intent of the Legislature.").

Second, the plain meaning of the words in a statute is controlling.[56] "Within" means "before the end of."[57] Thus, before the end of a six-month period after the Commission determines a need exists, the Commission may make its request of DWR. The Commission is not required to wait at least six months to do so.

Third, legislative history is of limited value in interpreting a statute. As noted by the California Supreme Court, "in construing a statute we will not consider as evidence in favor of a particular meaning the opinions of individual legislators who voted for the bill nor those of the author, on the ground there is no assurance that other legislators shared such opinions."[58] The document relied upon in CalCCA's comments was prepared for the Senate Rules Committee by the author of AB 1373; there is no indication that anyone other than the author of that bill concurred with the document's statement that there was intent to provide a minimum six-month window for LSEs to self-procure eligible energy resources.

In conclusion, there is no mandatory six-month waiting period between when the Commission determines there is a need for procurement of eligible energy resources[59] and when the Commission may request that the DWR act as the CPE to contract for those resources.[60] Given the California Energy Commission's determination that "OSW has the potential to be a major part of the solution to reducing California's [GHG] emissions from the electricity sector and reaching SB 100 [] goals,"[61] and the fact that OSW projects are likely to be large, gigawatt-scale projects that are not feasible for an LSE or group of LSEs to procure efficiently, the Commission should proceed with directing DWR to act as the CPE[62] as soon as it reasonably can after making the need determination.

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[56] *Ibid*. ("[C]ourts are bound to give effect to statutes according to the usual, ordinary import of the language employed in framing them." [citations omitted].)

[57] "Within." *Merriam-Webster.com Dictionary*, Merriam-Webster, https://www.merriam-webster.com/dictionary/within. Accessed 30 May. 2024.

[58] *Lungren v. Deukmejian* (1988) 45 Cal.3d 727, 742.

[59] P.U. Code 454.52(a)(4)(A).

[60] P.U. Code 454.52(a)(4)(C).

[61] Ruling at pp. 8-9.

[62] CalWEA is not necessarily opposed to an IOU acting as the central procurement entity. However, CalCCA objects to this and even SCE would want each IOU to conduct procurement for its territory basis (SCE at p. 18), which would also be inefficient for the same reasons.

I. Centrally Procured Resource Costs Should Be Allocated Under A 24-Hourly Reliability Framework

SCE proposes that the costs of centrally procured resources that are not yet in LSE portfolios be allocated to LSEs on an energy share basis because "these LLT clean energy resources are primarily needed to meet clean energy requirements."[63] CalWEA disagrees. All the resources that the Ruling proposes for consideration as "LLT resources," and certainly OSW, are desirable in large part because their production profiles closely match net load in CA, clearly depicting their pronounced capacity value. Out-of-state and offshore wind complement the production profile of solar energy, deliver in the critical evening peak hours, and reduce the need for storage capacity. LDES provides capacity, redistributing solar to critical hours.

Therefore, CalWEA's proposal to allocate costs based on a 24-hourly reliability framework, adopted in the IRP planning process, is appropriate. Moreover, the 24-hourly approach also reflects energy needs. Refinements could be made in the cost allocation process for centrally procured resources to more precisely account for the energy value of centrally procured resources.

J. The Net Costs of Centrally Procured Resources Should Be Recovered as A Public Purpose Program

CalWEA agrees with PG&E's recommendation that the new net benefits charge for Commission-authorized DWR central procurement be through each IOU's respective distribution rate component, and be included in the public purpose program rate with other state-mandated programs.[64] The resource diversity being promoted via central procurement is a public good whose costs should be borne equitably by all ratepayers, similarly to how all customers supported the Million Solar Roofs program through a trust fund supported by ratepayer bill charges, in addition to generous net metering tariffs (NEM 1 and NEM 2). As stated by EDF, "developing substantial offshore wind resources is crucial to the timely and cost-effective decarbonization of the electric grid, which will benefit all people in the State. Spreading the costs across the broadest possible range of ratepayers is consistent with the broad-ranging benefits of the resources themselves."[65]

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[63] SCE at pp. 26-27.

[64] PG&E at p. 21. Also see SCE's similar recommendation at p. 30.

[65] EDF at p. 15-16.

Respectfully submitted,

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On behalf of the California Wind Energy Association

June 5, 2024

VERIFICATION

I, Nancy Rader, am the Executive Director of the California Wind Energy Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of CALIFORNIA WIND ENERGY ASSOCIATION REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON NEED AND PROCESS FOR CENTRALIZED PROCUREMENT OF SPECIFIED LONG LEAD-TIME RESOURCES are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 5, 2024, at Berkeley, California.

/s/ *Nancy Rader*
Nancy Rader
Executive Director
California Wind Energy Association