

DOCKETED	
Docket Number:	18-IRP-01
Project Title:	Integrated Resource Plan
TN #:	266467
Document Title:	Executive Director Determination of Consistency Letter, CPAU 2023 IRP
Description:	N/A
Filer:	Mikayla Roberts
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/10/2025 2:52:46 PM
Docketed Date:	10/10/2025



October 10, 2025

James Stack
City of Palo Alto Utilities
250 Hamilton Avenue
Palo Alto, California 94301

Dear James Stack:

As required by Senate Bill 350 (De León, Chapter 547, Statutes of 2015) (SB 350) (in Public Utilities Code (PUC) Section 9622) the California Energy Commission (CEC) has reviewed the City of Palo Alto Utilities (CPAU) 2023 Integrated Resource Plan (IRP) filing, which was received on April 30, 2024. The CEC informed CPAU on April 29, 2025,¹ that the IRP filing was complete, as required by Chapter 3, Section B.1 of the *Publicly Owned Utilities' Integrated Resource Plan Guidelines (POU IRP Guidelines)*.²

Based on a detailed review and analysis of the IRP, standardized tables, and other supporting information, I determined, as documented in the *Review of City of Palo Alto Utilities 2023 Integrated Resource Plan* (October 2025), that CPAU's 2023 IRP is consistent with the requirements of PUC Section 9621, and meets California's energy and other policy goals, including:

- Achieving greenhouse gas emission reduction targets commensurate with the electricity sector's percentage of economy wide reductions of 40 percent from 1990 levels by 2030.
- Meeting the Renewables Portfolio Standard of 60 percent by 2030.
- Ensuring planning goals related to retail rates, reliability, transmission and distribution systems.
- Considering the role of renewable resources, grid efficiencies, energy storage, and distributed resources in meeting peak demand.
- Addressing procurement of energy efficiency and demand response, energy storage, transportation electrification, and portfolio diversification.

The *Review of City of Palo Alto Utilities 2023 Integrated Resource Plan*, available in Docket No 18-IRP-01, provides the details of the CEC's review and findings regarding the consistency of CPAU's IRP with PUC Section 9621. The CEC anticipates considering adoption of this determination at the CEC Business Meeting in December 2025.

¹ [Completeness Letter Palo Alto](https://efiling.energy.ca.gov/GetDocument.aspx?tn=262851&DocumentContentId=99468), CEC Docket 18-IRP-01, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=262851&DocumentContentId=99468>.

² See: [Publicly Owned Utility Integrated Resource Plans \(IRPs\)](http://www.energy.ca.gov/sb350/IRPs/index.html), <http://www.energy.ca.gov/sb350/IRPs/index.html>.

If you have any questions regarding this determination, please contact Bryan Neff at Bryan.Neff@energy.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Drew Bohan', with a stylized, flowing script.

Drew Bohan
Executive Director
California Energy Commission