

**DOCKETED**

<b>Docket Number:</b>	18-IRP-01
<b>Project Title:</b>	Integrated Resource Plan
<b>TN #:</b>	248636
<b>Document Title:</b>	Commercial Energy Feb 2023 Integrated Resource Plan Procurement Update
<b>Description:</b>	N/A
<b>Filer:</b>	Samantha Folsom
<b>Organization:</b>	Customized Energy Solutions
<b>Submitter Role:</b>	Applicant Consultant
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<b>Docketed Date:</b>	2/2/2023

**BEFORE THE PUBLIC UTILITIES  
COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop  
An Electricity Integrated Resource Planning  
Framework and to Coordinate and Refine  
Long-Term Procurement Planning Requirements

Rulemaking 20-05-003  
(Filed May 7, 2020)

**Commercial Energy of Montana d/b/a Commercial Energy of California February 2023  
Integrated Resource Plan Procurement Update**

**Public Version**

Commercial Energy of Montana, Inc.  
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Dated: February 1, 2023

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COMMISSION OF THE STATE OF CALIFORNIA**

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An Electricity Integrated Resource Planning  
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**Commercial Energy of Montana d/b/a Commercial Energy of California February 2023  
Integrated Resource Plan Procurement Update**

**Public Version**

In accordance with California Public Utilities Commission (“Commission”) D.19-11-016 & D.21-06-035, Commercial Energy of Montana dba Commercial Energy of California (“Commercial Energy”) hereby submits its February 2023 Integrated Resource Plan (“IRP”) Procurement Compliance Filing & Data Request to the Commission.

**I. Summary of Procurement Compliance & Additional Data Request**

Today we see far greater price volatility driven by the vagaries of weather, renewable generation, and net load. This has never been more evident as witnessed in today’s markets with all factors including natural gas storage shortage, the coldest start to winter in a decade, and near record rain fall in December 2022, converging to create a Bleak Energy Winter in a market now dominated by variable renewable energy resources. This occurrence resulted in record level volatility and the highest ever recorded spot prices for natural gas in December of 2022, and in turn carried through into wholesale electricity prices.

**a. D.19-11-016 Procurement Requirements**

Commercial Energy opted out of D.19-11-016 and therefore does not have any specific procurement compliance to report for D.19-11-016. Commercial Energy has continued to procure its short-term RA capacity obligations. Commercial Energy will continue to comply to all short and long-term system, local, and flexible requirements to the best of its ability as these resources are made available in the market.

**b. D.21-06-035 Procurement Requirements**

Commercial Energy has designed conforming portfolios to comply with D.21-06-035. Commercial Energy has contracted for short-term resources for significant portions of its 2023 RA obligations that have attained Commercial Operation Date as recently as January 2023. Commercial Energy has been engaged in discussions for long-term RA procurement to satisfy D.21-06-035 and is working to get a finalized contract in place by August 1. Commercial Energy currently has a very small market share of electricity customers, making it extremely challenging to find a market suitor for smaller requirements.

**Table 1: Procurement authorized in D.21-06-035 (CONFIDENTIAL)**

Load Serving Entity	Procurement Responsibility (MW NQC)
Commercial Energy of CA	[REDACTED]

Load Serving Entity	Minimum by 2023 (MW NQC)	Minimum by 2024 (MW NQC)	Minimum by 2025 (MW NQC)	Minimum Long Lead Time Capacity by 2026 (MW NQC)	Minimum Zero-Emitting Capacity by 2025 (MW NQC)	Total
Commercial Energy of CA	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**c. Additional Data Request**

Commercial Energy does not own any generating assets, nor is building any new facilities. Therefore, Commercial Energy does not have any projects under development to report on. Commercial Energy does not have any procurement of new resources in the Los Angeles Basin area to report.

**II. Request for Confidential Treatment**

Commercial Energy has included a motion to file under seal due to the confidential information included in this request. Redacted information included in this submission has been designated “Confidential”.

**III. Conclusion**

Commercial Energy thanks the Commission for its time and consideration in its review of Commercial Energy’s IRP procurement status and data update.

Respectfully submitted,



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Dated: February 1, 2023

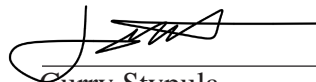
ATTACHMENT A  
RDTv3 (REDACTED)

**ATTACHMENT B**  
**OFFICER VERIFICATION**

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I am an officer of Commercial Energy of Montana, Inc dba Commercial energy of California and am authorized to make this verification of its behalf. The statements in the foregoing document are true of my own knowledge, except as to 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, and that this verification is executed on this 1<sup>st</sup> day of February 2023 at Oakland, California.



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Curry Stypula  
President  
Commercial Energy of Montana, Inc. dba  
Commercial Energy of California