



**California Energy Commission
December 8, 2025 Business Meeting
Backup Materials for City of Palo Alto Utilities**

The following backup materials for the above-referenced agenda item are available as described below:

1. Proposed Order, attached below.
2. Executive Director Letter to POU – [Executive Director Determination of Consistency Letter, CPAU 2023 IRP](#).
3. Staff Report – [Review of City of Palo Alto Utilities' 2023 Integrated Resource Plan](#).

For the complete record, please visit: [Docket 18-IRP-01](#)

To stay informed about this project and receive documents as they are filed, please subscribe to the proceeding Topic, which can be accessed here: [POU IRP Activities](#).

The Topic sends out email notifications and direct links when documents are filed in the proceeding docket.

STATE OF CALIFORNIA
STATE ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

IN THE MATTER OF:

**City of Palo Alto Utilities' 2023
Integrated Resource Plan Filing**

Docket No. 18-IRP-01

**ORDER FINDING COMPLIANCE WITH
PUBLIC UTILITIES CODE SECTION
9621**

I. BACKGROUND

Pursuant to Senate Bill 350 (Stats. 2015, ch. 547), Public Utilities Code (PUC) section 9621 requires publicly owned utilities with an annual electrical demand exceeding 700 gigawatt hours to adopt integrated resource plans (IRPs) at least once every five years and submit them to the California Energy Commission (CEC). The IRPs must contain supporting information sufficient to demonstrate that they meet certain requirements, including greenhouse gas emission reduction targets and renewable energy procurement goals, as set forth in PUC section 9621. Under PUC section 9622, the CEC must review IRPs for consistency with these requirements. On October 4, 2018, the CEC adopted the *Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines* to govern the submission of IRPs.

II. STAFF RECOMMENDATION

Staff recommends that the CEC find the City of Palo Alto Utilities' 2023 IRP, filed on April 30, 2024, under Docket Number 18-IRP-01, complete and consistent with the requirements of PUC section 9621.

III. ENERGY COMMISSION FINDINGS

- a. On April 30, 2024, City of Palo Alto Utilities Power submitted an IRP and supporting documentation to the CEC (the IRP Filing); and
- b. On April 29, 2025, CEC staff filed its notification of completeness letter informing City of Palo Alto Utilities that its IRP Filing was complete; and

- c. The complete IRP Filing has been available on the CEC website since April 30, 2024, and no public comments were received; and
- d. On October 10, 2025, CEC staff, under the authority of the Executive Director, filed its review on the CEC website (*Review of City of Palo Alto Utilities 2023 Integrated Resource Plan*, TN No. 266465) determining the IRP Filing to be consistent with the requirements for PUC Section 9621 and this document has been available for public comment for at least 45 days; and
- e. On October 10, 2025, CEC staff informed City of Palo Alto Utilities in writing of staff's determination (TN No. 266467) and the Executive Director informed City of Palo Alto Utilities in writing that the CEC would consider adopting this determination at the CEC Business Meeting on December 8, 2025; and
- f. The CEC concurs with staff's recommendation that City of Palo Alto Utilities' IRP Filing is complete and consistent with the requirements of PUC section 9621.

IV. CONCLUSION AND ORDER

The CEC hereby adopts staff's recommendation and orders that City of Palo Alto Utilities' IRP Filing complies with requirements set forth in Public Utilities Code section 9621.

IT IS SO ORDERED.

CERTIFICATION

The undersigned Secretariat to the CEC does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the CEC held on December 8, 2025.

AYE:

NAY:

ABSENT:

ABSTAIN:

Kim Todd
Secretariat