

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

Order Instituting Rulemaking to Continue  
Oversight of Electric Integrated Resource  
Planning and Procurement Processes.

R.25-06-019

**DESERT COMMUNITY ENERGY'S  
DECEMBER 2025 IRP COMPLIANCE FILING AND DATA RESPONSE  
PUBLIC VERSION**

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*Attorneys for*  
**DESERT COMMUNITY ENERGY**

December 2, 2025

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In accordance with California Public Utilities Code sections 454.51 and 454.52, California Public Utilities Commission Decisions 20-12-044, 21-06-035, and 23-02-040, and Staff guidance concerning document submissions in the above-captioned proceeding, Desert Community Energy (DCE) hereby submits its *December 2025 IRP Compliance Filing and Data Response* (IRP Compliance Filing). DCE is e-filing a public version of DCE's IRP Compliance Filing with the Commission's Docket Office and serving it on all parties identified on the official service list for this proceeding. DCE provided confidential documents associated with its IRP Compliance Filing through the Commission's secure FTP website.

Attached to this filing are the following documents:

1. Attachment A – Verification
2. Attachment B – Resource Data Template Version 3.5.3 (redacted)
3. Attachment C – Crosswalk Table and Remediation Plan
4. Attachment D – Athos Resource Adequacy + TB4 Agreement
5. Attachment E – Large Generator Interconnection Agreement Among SE Athos I, SE Athos II, Southern California Edison Company, and CAISO

DCE requests that the Commission find DCE in compliance with the requirements of D.20-12-044, D.21-06-035, and D.23-02-040 and not initiate backstop procurement on DCE's behalf or assess compliance penalties at this time.

Respectfully submitted,

BEST BEST & KRIEGER LLP



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RYAN M. F. BARON

December 2, 2025

**DESERT COMMUNITY ENERGY  
IRP COMPLIANCE FILING AND DATA RESPONSE  
DECEMBER 2025**

PUBLIC VERSION


ATTACHMENT A

## **VERIFICATION**

I am the Executive Director for Desert Community Energy, a public agency, and I am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters stated on information and belief, and as to those matters I believe them to be true. The spreadsheet templates used within this filing have not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 24<sup>th</sup>, 2025, at Palm Desert, California.

By:   
Tom Kirk (Nov 21, 2025 17:26:33 PST)

Tom Kirk  
Executive Director  
Desert Community Energy  
74199 El Paseo, Suite 100  
Palm Desert, CA 92260  
(760) 346-1127  
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**DESERT COMMUNITY ENERGY  
IRP COMPLIANCE FILING AND DATA RESPONSE  
DECEMBER 2025**

PUBLIC VERSION

ATTACHMENT B


# RDT Certification Form – Verification Declaration

Load Serving Entity Full Name: Desert Community Energy  
Load Serving Entity Abbreviation: DCE  
Submission Type: Mid-Term Reliability (D.21-06-035)/Supplemental Mid-Term Reliability (D.23-02-040)  
Date of Filing: 12/2/2025


Consistent with Rules 1.1 & 1.11 of the CPUC's Rules of Practice and Procedure, this Procurement Showing has been verified by an officer of the corporation or organization, who expressly certifies, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this showing;
2. I have reviewed, or have caused to be reviewed, this showing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this filing contains all of the information required to be provided by CPUC orders, rules, and regulations.

## LSE Officer

Title: Executive Director  
Name: Tom Kirk  
Email: [tkirk@cvag.org](mailto:tkirk@cvag.org)  
Phone: 760-346-1127  
Signature:   
Tom Kirk (Nov 21, 2025 17:26:13 PST)

## Backup Contact Information

Title: Director of Energy and Sustainability  
Name: Lisa McNeilly  
Email: [lmcneilly@cvag.org](mailto:lmcneilly@cvag.org)  
Phone: 760-346-1127  
Signature: 

## Load Serving Entity Information

LSE Address Line 1: 74-199 El Paseo, Suite 100  
LSE Address Line 2:  
LSE City: Palm Desert  
LSE State: CA  
LSE Zip: 92260

ke_unique_contract_id	resource	alternative_resource_name	contract_status	project_interconnection_position	interconnection_substation	marginal_addition	marginal_addition_to	total_nameplate_capacity	contracted_nameplate_capacity	sep_contracted_mw_mqc	contract_gwh_annual	is_hybrid_paired	can_charge_from_grid
DCE_FPA_Coachella1st	GSNET_2_COAWOZ	COACHELLA 2	Online		NA	NA						NotHybrid	
DCE_BAONLY_OhmConnect_1	_NEW_GENERIC_DR	OhmConnect Demand Response, FIGB_2_PDRP57	Online		NA	NA		5				NotHybrid	
DCE_BAONLY_OhmConnect_2	_NEW_GENERIC_DR	OhmConnect Demand Response, FIGB_2_PDRP04	Online		NA	NA		5				NotHybrid	
DCE_BAONLY_OhmConnect_3	_NEW_GENERIC_DR	OhmConnect Demand Response, FIGB_2_PDRP01	Online		NA	NA		5				NotHybrid	
DCE_BAONLY_OhmConnect_4	_NEW_GENERIC_DR	OhmConnect Demand Response, SECC_1_PDRP99	Online		NA	NA		5				NotHybrid	
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DCE_FPA_FerrovEnergy	_NEW_GENERIC_GEO_THERMAL	Cape Generating Station	Development	geothermal_import_planned	INTERMT_3_NS06	NA		26				NotHybrid	
DCE_FPA_FerrovEnergy_general	_NEW_GENERIC_GEO_THERMAL	Cape Generating Station	Development	geothermal_import_planned	INTERMT_3_NS06	NA		26				NotHybrid	
DCE_ESA_Balam	_NEW_GENERIC_BATTERY_STORAGE	Balam Project LLC	Development		Chino	NA		400				NotHybrid	
DCE_ESA_Athos_2	_NEW_GENERIC_BATTERY_STORAGE	Athos Storage, LLC	Development		Red Bluff	NA		100				NotHybrid	
DCE_ESA_Athos_4	_NEW_GENERIC_BATTERY_STORAGE	Athos Storage, LLC	Development		Red Bluff	NA		100				NotHybrid	
DCE_ESA_Athos_5	_NEW_GENERIC_BATTERY_STORAGE	Athos Storage, LLC	Development		Red Bluff	NA		100				NotHybrid	
DCE_ESA_Balam_general	_NEW_GENERIC_BATTERY_STORAGE	Balam Project LLC	Development		Chino	NA		400				NotHybrid	
DCE_BAONLY_VCE_ChaparralSprings_gen	DSFLWR_2_WFCSB2_SUN	WILLY 9 CHAP 2	Online		NA	NA		72				ExistingSolarExistingStorage	NO
DCE_BAONLY_VCE_ChaparralSprings_sto	DSFLWR_2_WFCSB2_LSSR	WILLY 9 CHAP 2	Online		NA	NA		72				ExistingSolarExistingStorage	NO

total_generator_mw	contracted_generator_mw	total_storage_mw	contracted_storage_mw	solar_technology_sub_type	storage_technology_sub_type	total_storage_depth_mwh	contracted_storage_depth_mwh	viability_cod_reasonableness	viability_technical_feasibility	viability_financing_sitecontrol	resource_mix	11911016_vamo_ghgrf	buy_sell_own	counterparty
											[wind, 10.8] [dr, 0.75] [dr, 0.75] [dr, 0.75] [dr, 0.75] [dr, 0.75] [geothermal, 4] [geothermal, 4] [battery, 21] [battery, 43] [battery, 43] [battery, 43] [battery, 21]			
72	33.98	36	0	1Axis	Li	3200	168	4	2	4	[solar, 33.98][battery, 16.99]		Buy	Valley Clean Energy Alliance
72	0	36	16.99	1Axis	Li	144	67.96	4	2	2	[solar, 33.98][battery, 16.99]		Buy	Valley Clean Energy Alliance



tx_upgrade_date_year	tx_upgrade_date_month	tx_upgrade_date_day	tx_upgrade_description	d2106035_procurement_cat	mtr_tranche1_NQC	mtr_tranche2_NQC	mtr_tranche3_NQC	mtr_tranche4_NQC	mtr_tranche5_NQC	mtr_tranche6_NQC	mtr_NQC_ZE_gen_paired_dr	mtr_bridge_to	mtr_contract_changed	previous_COD_year	previous_COD_month	previous_COD_day	remediation_plan
				general	1.5									2021	5	4	NO
				general	0.75									2023	1	1	NO
				general	0.75									2023	1	1	NO
				general	0.75									2023	1	1	NO
				general	0.75									2023	1	1	NO
				general	0.75									2023	1	1	NO
				general	0.75									2023	1	1	NO
				firm_ZE	0									2023	1	1	NO
				general	0									2026	6	1	YES
				long_duration_storage	0									2026	6	1	YES
				general	0									NA	NA	NA	NO
				general	0									NA	NA	NA	NO
				general	0									NA	NA	NA	NO
				general	0									NA	NA	NA	NO
				general	0									NA	NA	NA	NO
				general	0									NA	NA	NA	NO

ower ("LADWP") and PacifiCorp. No issues were identified on potentially affected neighboring systems. Fervo executed a F  
 iver ("LADWP") and PacifiCorp. No issues were identified on potentially affected neighboring systems. Fervo executed a F  
 ues with permitting have been identified, and the project has received Full Capacity Deliverability Status. The project site  
 compliance, the project needs to apply annually for Interim Deliverability Status (IDS). The project will not receive Full Capa  
 compliance, the project needs to apply annually for Interim Deliverability Status (IDS). The project will not receive Full Capa  
 ues with permitting have been identified, and the project has received Full Capacity Deliverability Status. The project site

signed_contract	notice_to_proceed	public_contract	buying_energy_capacity	NQC_reporting_source	procurement_origin	planned_project_retention_priority	csp_resource_category	csp_annual_2026	csp_annual_2030	csp_annual_2035	csp_annual_2040	csp_annual_2045	macro_supertype	notes
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MPS								physical	
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MTR								newgeneric	
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MTR								newgeneric	
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MTR								newgeneric	
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MTR								newgeneric	
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MTR								newgeneric	
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MTR								newgeneric	
YES	NO	redacted contract is public	EnergyCapacity	Calculated	MTR								newgeneric	
YES	NO	redacted contract is public	CapacityOnly	In the contract	MTR								newgeneric	
YES	NO	redacted contract is public	CapacityOnly	In the contract	MTR								newgeneric	
YES	NO	redacted contract is public	CapacityOnly	In the contract	MTR								newgeneric	
YES	NO	redacted contract is public	CapacityOnly	In the contract	MTR								newgeneric	
YES	NO	NO	CapacityOnly	In the contract	MTR Bridge								physical	
YES	NO	NO	CapacityOnly	In the contract	MTR Bridge								physical	

























elcc_non_hybrid_resource	elcc_hybrid_gen_resource	elcc_match_resource_type_non_hybrid
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[REDACTED]	[REDACTED]	FALSE
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[REDACTED]	[REDACTED]	[REDACTED]

























**DESERT COMMUNITY ENERGY  
IRP COMPLIANCE FILING AND DATA RESPONSE  
DECEMBER 2025**

PUBLIC VERSION

ATTACHMENT C

**Desert Community Energy  
Crosswalk Table  
December 2025 IRP Compliance Filing and Data Response**

<b>Document Name</b>	<b>LSE Unique Contract ID</b>	<b>Milestone Requirement Met and/or NP Contract Validation</b>	<b>Decision and Tranche</b>	<b>Compliance Filing Date</b>	<b>Location</b>
DCE_Terra-Gen_CoachellaHills_COD_Notice	DCE_PPA_CoachellaHills	Milestone 3 - online	D.21-06-035, 2023	2/1/2023	See below
DCE_OhmConnect_ResiStation_WSPPConfirmation	DCE_RAONLY_OhmConnect_1, DCE_RAONLY_OhmConnect_2	Milestone 3 - online	D.21-06-035, 2023	2/1/2023	See below
DCE_OhmConnect_ResiStation_RA_Filing_and_CIRA_Screenshot	DCE_RAONLY_OhmConnect_1, DCE_RAONLY_OhmConnect_2	Milestone 3 - online	D.21-06-035, 2023	2/1/2023	See below
DCE_FervoEnergy_CapeGenerating_PPA	DCE_PPA_FervoEnergy	Milestone 1 - executed contract, NP Contract validation	D.21-06-035, 2028	2/1/2023	NP validation PPA p. 2
DCE_FervoEnergy_CapeGenerating_PPA_Amendment1	DCE_PPA_FervoEnergy	Milestone 1 - executed contract, NP Contract validation	D.21-06-035, 2028	12/2/2024	Attachment F, PDF p. 2 NP validation Amendment #1 PPA p. 3
DCE_FervoEnergy_CapeGenerating_Engineering_assessment	DCE_PPA_FervoEnergy	Milestone 1 - executed contract	D.21-06-035, 2028	2/1/2023	See below

<b>Document Name</b>	<b>LSE Unique Contract ID</b>	<b>Milestone Requirement Met and/or NP Contract Validation</b>	<b>Decision and Tranche</b>	<b>Compliance Filing Date</b>	<b>Location</b>
DCE_FervoEnergy_Cape Generating_Evidence_of_site_control	DCE_PPA_FervoEnergy	Milestone 1 - executed contract	D.21-06-035, 2028	2/1/2023	See below
DCE_FervoEnergy_Cape Generating_LGIA	DCE_PPA_FervoEnergy	Milestone 1 - executed contract	D.21-06-035, 2028	12/2/2024	Attachment G, PDF p. 8
DCE_NextERA_DesertSands_ESA	DCE_ESA_DesertSands	Milestone 1 - executed contract, NP Contract validation	D.21-06-035, 2024, 2027, 2028	12/1/2023	PDF p. 11 NP validation ESA p. 1
DCE_NextERA_DesertSands_Evidence_of_site_control	DCE_ESA_DesertSands	Milestone 1 - executed contract	D.21-06-035, 2024, 2027, 2028	12/1/2023	Appendix D, PDF p. 143
DCE_NextERA_DesertSands_LGIA	DCE_ESA_DesertSands	Milestone 1 - executed contract	D.21-06-035, 2024, 2027, 2028	12/2/2024	Attachment H, PDF p. 10
DCE_ESA_Athos_ESA	DCE_ESA_Athos	Milestone 1 - executed contract	D.21-06-035, D.23-02-040, 2024, 2026, 2027	12/2/2025	Attachment D
DCE_ESA_Athos_IA	DCE_ESA_Athos	Milestone 1 - executed contract	D.21-06-035, D.23-02-040, 2024, 2026, 2027	12/2/2025	Attachment E
DCE_ESA_Balsam_ESA	DCE_ESA_Balsam	Milestone 1 - executed contract	D.21-06-035, D.23-02-040, D.24-02-047, 2028	12/2/2025	DCE Advice Letter 14-E-A, Exhibit B, Attachment 2

Document Name	LSE Unique Contract ID	Milestone Requirement Met and/or NP Contract Validation	Decision and Tranche	Compliance Filing Date	Location
DCE_ESA_Balsam_Evidence_of_site_control	DCE_ESA_Balsam	Milestone 1 - executed contract	D.21-06-035, D.23-02-040, D.24-02-047, 2028	12/2/2025	DCE Advice Letter 14-E-A, Exhibit B, Attachment 3
DCE_ESA_Balsam_IA	DCE_ESA_Balsam	Milestone 1 - executed contract	D.21-06-035, D.23-02-040, D.24-02-047, 2028	12/2/2025	DCE Advice Letter 14-E-A, Exhibit B, Attachment 4

Except as noted, the above documents are available at <https://desertcommunityenergy.org/about/key-documents/>.

## **Desert Community Energy Remediation Plan**

In its February 1, 2023, IRP Procurement Report, Desert Community Energy (DCE) reported a contract with a resource that had not yet attained its commercial on-line dates, Deer Creek Solar I LLC (Deer Creek). On June 29, 2023, DCE sent Deer Creek a Notice of Termination for this project. DCE subsequently notified the CPUC of this contract failure. The contract failure caused DCE to seek substitute resources needed to meet Mid-Term Reliability (MTR) procurement requirements under D.21-06-035 and D.23-02-040 (MTR Decisions).

On September 27, 2023, DCE entered into a 15-year Energy Storage Agreement with Desert Sands Energy Storage II, LLC, a subsidiary of NextEra Energy Resources (Desert Sands). The contract was for a 25 MW / 200 MWh lithium-ion battery storage facility located in DCE's Palm Springs service territory, originally with an expected commercial operation date (COD) of March 31, 2035.

On July 15, 2024, DCE released a Request for Proposals (RFP) seeking proposals for renewable energy and storage projects that meet MTR procurement requirements. DCE also sought to procure bridge resources for the 2025-2028 compliance period to replace the attributes of the Diablo Canyon Power Plant, in accordance with D.24-09-006 issued on September 12, 2024. DCE received 47 proposals from 15 bidders, including projects that satisfy IRP procurement requirements. An evaluation committee identified a short list of 17 proposals from five bidders upon which to conduct a more detailed review and interviewed the short-listed bidders during the week of October 7, 2024. In December 2024, the Board approved a long-term Power Purchase Agreement with San Gorgonio Westwind II, LLC for its north Palm Springs wind project Phoenix, but this project was not MTR-eligible.

The RFP was re-opened on January 24, 2025, for a second round of proposals. Responses to the second round of this RFP were due on February 7, 2025. In March 2025, the evaluation committee, made up of The Energy Authority (TEA) and DCE staff, screened proposals for completeness and evaluated those offering a four-hour MTR battery (RA+TB4). After scoring them on a weighted criteria basis, DCE staff and TEA identified a short list of three proposed transactions and conducted interviews with the bidders. On June 16, 2025, the DCE Board approved a 15-year Resource Adequacy + TB4 Agreement (RA+TB4) with Athos Storage LLC, for its Riverside County Battery Energy Storage System (BESS) project near Desert Center (Athos Storage). DCE contracted for 43 MW / 172 MW-hour of the capacity at the Athos Storage project to meet its MTR obligations for resource adequacy. The remaining capacity of the battery storage facility will be contracted to other off-takers. The COD for the Athos Storage project is February 1, 2027.

In September 2025, the DCE Board approved a Resource Adequacy and TB8 Agreement (RA+TB8) with Balsam Project LLC, a subsidiary of Aypa Power (Balsam Project). The project is located in San Bernardino County. The Balsam Project is an eight-hour battery resource. DCE has contracted for 21 MW / 168 MW-hour of the total capacity of the project to meet its long lead time long duration storage MTR obligations. The remaining capacity of the battery storage facility will be contracted to other off-takers. The project has a guaranteed COD of August 1, 2028.

In addition to long-term contracts, DCE is engaging in MTR compliance transactions with other load-serving entities (LSEs). DCE entered into four Resource Adequacy (RA) agreements with Valley Clean Energy Alliance (VCE) in which DCE purchased RA from MTR-compliant resources:

- Effective June 11, 2024, DCE purchased 18 MW Net Qualifying Capacity (NQC) for the months of August - December 2024.
- Effective July 10, 2024, DCE purchased 1.85 MW NQC for the months of September - December 2024.
- Effective December 16, 2024, DCE purchased 20 MW NQC for the months of February - May 2025.
- Effective April 16, 2025, DCE purchased 16.99 MW of battery storage paired with 33.98 MW of solar for the months of June - December 2025.

These transactions were previously reported in the Resource Data Template as a general tranche 2 (2024) partial bridge to Desert Sands. Due to D.25-09-007, DCE ceased contracting for bridge capacity and now only reports one of the four bridge transactions in the RDT: the transaction for June-December 2025 because this contract is still active.

On July 11, 2024, The Regents of the University of California (UC) submitted Tier 2 Advice Letter (AL) 25-E, documenting trade arrangement details pertaining to MTR compliance under D.21-06-035. UC will take on 1.25 MW of 2025 Minimum Zero Emitting Capacity Obligation from DCE, and DCE will take on 1 MW of 2028 Minimum Long Lead Time, Long Duration Storage Obligation from UC. The CPUC issued a Disposition Letter on August 29, 2024, approving UC AL 25-E with an effective date of August 10, 2024.

On January 10, 2025, UC submitted AL 26-E documenting an additional trade arrangement pertaining to MTR compliance under D.21-06-035. UC will take on 2.66 MW of 2025 Minimum Zero Emitting Capacity Obligation from DCE, and DCE will take on 1 MW of 2028 Minimum Long Lead Time, Clean Firm Obligation from UC. The 4 MW purchased from the Cape Station project is expected to meet the collective obligations for Clean Firm capacity of DCE and UC. The CPUC issued a Disposition Letter on February 14, 2025 approving UC AL 26-E with an effective date of February 9, 2025.

On May 29, 2025, DCE submitted AL 13-E documenting an additional trade arrangement pertaining to MTR compliance under D.21-06-035. VCE will take on 3.09 MW of 2025 Minimum Zero Emitting Capacity Obligation from DCE, and DCE will take on 2.03 MW of 2028 Minimum Long Lead Time, Long Duration Storage Obligation from VCE. This transaction, along with the UC obligation trades, fulfills DCE's Minimum Zero Emitting Capacity (Diablo Canyon Replacement) Obligation. The 3.09 MW of 2025 Minimum Zero Emitting Capacity Obligation is divided between the 2024 tranche (3 MW) and 2025 tranche (0.09 MW). This is reported in the RDT. This advice letter was accepted on August 13, 2025 with an effective date of June 30, 2025.

On October 21, 2024, DCE entered into Amendment No. 1 to the Renewable Power Purchase Agreement (PPA) with Cape Generating Station 1 LLC, a subsidiary of Fervo Energy, for the Cape Station geothermal project located in Beaver County, Utah. The Amendment extends the Commercial Operation Date for the project from June 1, 2026, to January 1, 2031. As part of the

amendment, DCE's average net capacity for the project is increasing from 3 MW to 4 MW. The Amendment was signed on January 9, 2025.

In accordance with D.24-02-047, DCE filed Advice Letter 14-E requesting an extension due to project development delays to June 1, 2031, for the Cape Station project. On October 8, 2025, DCE supplemented this Advice Letter with additional information and requested an extension of the long-duration energy storage requirement to August 1, 2028 due to the delay in Desert Sands COD, as discussed below, and replacement with the Balsam Project contract. The Advice Letter was accepted on November 17, 2025 with an effective date of November 7, 2025.

As a relatively small LSE, DCE's ability to fulfill its MTR obligations is tied to the success or failure of a very small number of projects. The ability to spread development risk across projects is limited: project developers typically have a minimum size when contracting, and even this minimum size is likely to fulfill a vast majority, if not all, of DCE's MTR obligations. For example, when DCE executed the Deer Creek project in 2020, it would have fulfilled all of DCE's Tranche 2 through 5 MTR needs. However, the project's failure due to circumstances beyond DCE's control meant attempting to procure a replacement project in 2022, during a period of extremely high uncertainty regarding renewables, particularly solar development.

DCE faces a similar situation with the Desert Sands project. Desert Sands received 300 MW of Full Capacity Deliverability Status on May 31, 2024; however, the deliverability is contingent upon the Southern Area Reinforcement Project. In contracting with Desert Sands, DCE sought to mitigate development risk by choosing an experienced developer. Despite a 3 MW long duration and long lead time obligation, DCE procured a full 25 MW slice of the project to meet its obligations, mostly due to the developer's contracting size minimums. The original COD of this project would have allowed it to replace a significant portion of the MTR obligations left open following the Deer Creek failure. On April 14, 2025, CAISO released a Participation Transmission Owner (PTO) Extension Notification, assigning the project an updated COD of March 31, 2035. A COD delay to 2035 would render the project ineligible for MTR compliance, requiring DCE to seek replacement contracts. The 8-year delay of the Southern Area Reinforcement Project until 2035 is a circumstance that DCE cannot be expected to anticipate. As of Q4 2025, this contingency cannot be removed. The capacity purchased from the Athos Storage and Balsam Project contracts is anticipated to replace the capacity from Desert Sands and meet all of DCE's remaining MTR obligations.

**DESERT COMMUNITY ENERGY  
IRP COMPLIANCE FILING AND DATA RESPONSE  
DECEMBER 2025**

PUBLIC VERSION

ATTACHMENT D

**ATHOS RESOURCE ADEQUACY + TB4 AGREEMENT**

The attachment can be accessed at

[https://desertcommunityenergy.org/wp-content/uploads/2025/06/Athos\\_RA\\_TB4.pdf](https://desertcommunityenergy.org/wp-content/uploads/2025/06/Athos_RA_TB4.pdf)

or

contact Kari Cameron at [kari.cameron@bbklaw.com](mailto:kari.cameron@bbklaw.com)  
for a redacted version

**DESERT COMMUNITY ENERGY  
IRP COMPLIANCE FILING AND DATA RESPONSE  
DECEMBER 2025**

PUBLIC VERSION

ATTACHMENT E

**LARGE GENERATOR INTERCONNECTION AGREEMENT  
AMONG SE ATHOS I, SE ATHOS II, SOUTHERN CALIFORNIA  
EDISON COMPANY, AND CAISO**

The attachment can be accessed at

<https://desertcommunityenergy.org/about/key-documents/>

or

contact Kari Cameron at [kari.cameron@bbklaw.com](mailto:kari.cameron@bbklaw.com)

for a redacted version