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PG&E Comments RE IEPR Workshop on Demand Forecast Inputs and Assumptions

Additional submitted attachment is included below.



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California Energy Commission
Docket Number 25-IEPR-03
715 P Street
Sacramento, CA 95814

RE: CEC IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions, held on August 6th.

In this letter, PG&E expresses support for three concepts: 1) developing scenarios that include a wide range of policy and economic assumptions, 2) developing technical documentation for the IEPR forecast, 3) holding additional discussion on the impacts of COVID-19 on load forecasting.

PG&E is supportive of CEC developing a range of scenarios to illustrate uncertainty.

PG&E supports and appreciates the CEC's plan to use scenarios to convey a wide range of uncertainty related to the load modifier forecasts. These forecasts are driven by assumptions about policy and economics. Developments this year at regional, state, and federal level suggest that policy and economic uncertainty are likely higher than typical in recent years. Consequently, PG&E believes a scenario modeling framework reflecting a wide range of policy and economic uncertainty will benefit the IEPR forecast. PG&E looks forward to actively participating in the CEC's stakeholder engagement process throughout the 2025 IEPR cycle to provide additional feedback on the CEC's scenario development.

PG&E supports the request for technical documentation for the IEPR forecast.

PG&E supports the request, raised in the Q&A section, for standard written documentation of the CEC's IEPR forecasting process. The summary descriptive presentations in meetings like this are sensibly tailored to the needs of a broad group of stakeholders. However, as models, policies, and data usage become more complex – and utilities like PG&E face more demands for detailed comparisons with the CEC IEPR forecast – it is becoming clear that there is no substitute for technical documentation. We would be happy to discuss with CEC forecasters the least burdensome form that such documentation could take for all stakeholders.

PG&E will seek further discussion on the CEC's approach to modeling the impacts of COVID-19.

PG&E thanks the CEC for clarifying, in the Q&A section, that there is no specific adjustment in the IEPR forecast for COVID-19 impacts or remote work practices following the pandemic and that any such changes would be captured in the forecast via historical data. We have no disagreement with this practice but look forward to discussing informally to develop a shared narrative regarding the dynamics of remote work, its impacts on electricity demand (if any), and any other changes in underlying demand that may have occurred in the past few years.

Sincerely,

Josh Harmon
State Agency Relations