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Additional submitted attachment is included below.



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BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of,

**2017 Integrated Energy Policy Report
(2017 IEPR)**

Docket No. 17-IEPR-07

COMMENTS OF ROSEVILLE ELECTRIC UTILITY ON THE COMMISSIONER WORKSHOP ON PUBLICLY OWNED UTILITIES INTEGRATED RESOURCE PLANS

1. Introduction

Roseville Electric Utility (Roseville) appreciates the opportunity to provide comments to the California Energy Commission (Commission or CEC) on the February 23 *Commissioner Workshop on Publicly Owned Utilities Integrated Resource Plans* (workshop) and the staff paper titled *The Proposed Guideline Topics for Publicly Owned Utilities' Integrated Resource Plans* ([discussion document](#)).

A Publicly Owned Utility (POU) established in 1912, Roseville is located in Northern California and is governed by its City Council. Roseville serves over 58,000 customers, with an annual electricity load of over 1.1 million MWh. Roseville intends to comply with SB 350, and supports California's goals of reducing greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2030.

Roseville Electric summarizes its comments and recommendations relating to the workshop and discussion document as follows:

- POU IRPs are locally authorized planning documents;
- SB 350 establishes a clearly defined and limited role for the Commission to review POU IRPs;
- There was no stated intent in SB 350 for POU IRPs to be linked with or subsumed into the statewide Integrated Energy Policy Report (IEPR)- they are separate processes;
- The Commission should obtain information for the IEPR consistent with existing regulations and ensure that such data requests are practical and not unnecessarily burdensome.

Answers to the questions posed in the discussion document are at the end of Roseville's comments.

2. Discussion

- a. **POU IRPs are locally authorized planning documents and SB 350 establishes a clearly defined and limited role for the Commission to review them.**

Though their exact contents vary by utility, IRPs have traditionally served as documents for POU's to plan how they will meet the future electricity needs of their ratepayers. IRPs are generally approved by a POU's governing authority- in the case of Roseville, its City Council.

The language of SB 350 acknowledges in several areas that locally elected officials have the power to both adopt an IRP and authorize procurement:

- Public Utilities Code (PUC) 9621(b) states that “the governing board of a local publicly owned electric utility shall adopt an integrated resource plan;”
- PUC 9621(c)(2)(A) states that “The governing board of the local publicly owned electric utility may authorize all source procurement;”
- PUC 9621(c)(2)(B) states that “The governing board may authorize procurement.”

In contrast, SB 350 limits the Commission's involvement in IRPs to a review of whether the IRPs are consistent with the requirements of PUC 9621, and permits the Commission to provide recommendations to correct deficiencies “If the Energy Commission determines an integrated resource plan or plan update is inconsistent with the requirements of Section 9621.” To that end, the Commission “may adopt guidelines to govern the submission of information and data and reports needed to support the Energy Commission's review of the utility's integrated resource plan.”¹

PUC 9622 authorizes the Commission to adopt guidelines seeking information needed for its review of POU IRP compliance with PUC 9621, and only that. The stated intent of SB 350 in having the Commission review POU IRPs is twofold: to ensure POU's are addressing procurement in the areas enumerated in SB 350,² and for POU's to show they are planning to achieve their share of the state's 2030 GHG and RPS targets, as well as the goals of PUC 454.52(1)(a).³

For the areas enumerated in PUC 9621(b),⁴ the Commission has only been granted authority to adopt guidelines for information needed to support its review of whether an IRP is compliant with SB

¹ PUC 9622(c).

² PUC 9621(c)(1)

³ PUC 9621(b)

⁴ PUC 6921(b)

(1) Meets the greenhouse gas emissions reduction targets established by the State Air Resources Board, in coordination with the commission and the Energy Commission, for the electricity sector and each local publicly-owned electric utility that reflect the electricity sector's percentage in achieving the economywide greenhouse gas emissions reductions of 40 percent from 1990 levels by 2030.

(2) Ensures procurement of at least 50 percent eligible renewable energy resources by 2030 consistent with Article 16 (commencing with Section 399.11) of Chapter 2.3.

(3) Meets the goals specified in subparagraphs (C) to (H), inclusive, of paragraph (1) of subdivision (a) of Section 454.52.

PUC 454.52(1)(a)

(C) Enable each electrical corporation to fulfill its obligation to serve its customers at just and reasonable rates.

(D) Minimize impacts on ratepayers' bills.

(E) Ensure system and local reliability.

(F) Strengthen the diversity, sustainability, and resilience of the bulk transmission and distribution systems, and local communities.

350. In other words, any guidelines may only request information in a POU's IRP showing how the POU is planning to meet its share of California's 2030 GHG and RPS target- subject to just and reasonable rates, minimal impacts on ratepayers' bills, and system reliability- and the other goals of PUC 454.52(1)(a). Any guidelines unrelated to, or beyond what is needed by, the Commission to review POU IRP consistency with the requirements of PUC 9621 would exceed the authority granted the Commission in PUC 9622.

Regarding PUC 9621(c)(1), POU IRPs "shall address procurement for the following:" energy efficiency, demand response, energy storage, transportation electrification, and a "diversified procurement portfolio consisting of both short-term and long-term electricity, electricity-related, and demand response products."⁵ It is clear from the language of SB 350 that **a POU may qualitatively or quantitatively address its procurement**, or lack thereof, of the aforementioned resources in its IRP **and be consistent with the requirements of PUC 9621**. In other words, for these areas of a POU's IRP, **guidelines are not needed to support the Commission's review**.

b. SB 350 did not express an intent for POU IRPs to be subsumed into the statewide Integrated Energy Policy Report (IEPR).

Roseville plans to comply with SB 350 and intends to provide the Commission with the same information presented to its governing authority in adopting its IRP. POU IRPs serve as locally approved planning documents. These planning documents are to be reviewed by the Commission on an advisory basis and only to determine consistency with the requirements of SB 350.

On December 15, 2015, the Commission opened [Docket: 16-OIR-01](#), or the *General Rulemaking Proceeding for Developing Regulations, Guidelines and Policies for Implementing SB 350 and AB 802*. Among other issues, this proceeding was to consider establishing guidelines to govern the submission of information needed to support the Commission's review of POU IRPs, as directed by SB 350. Over a year later- without explaining, consulting with, or providing prior notice to the affected POU- on February 8, 2017, the Commission changed this portion of the 16-OIR-01 proceeding to a sub-proceeding of the IEPR, 17-IEPR-07. In noticing a February 23 workshop on POU IRPs, the Commission stated:

Under SB 350, IRPs will inform state policy makers on the strategies and plans of POU- to achieve California's renewable procurement and energy efficiency goals under various planning scenarios. In addition, when aggregated with information from the IRPs of load serving entities submitted to the California Public Utilities Commission (CPUC), these plans will allow state policy makers to track progress in meeting the state's electricity sector Green House Gas (GHG) emission reduction target.

(G) Enhance distribution systems and demand-side energy management.

(H) Minimize localized air pollutants and other greenhouse gas emissions, with early priority on disadvantaged communities identified pursuant to Section 39711 of the Health and Safety Code.

⁵ PUC 9621(c)(1).

The IEPR is a quadrennial state report which discusses “trends and issues concerning electricity and natural gas, transportation, energy efficiency, renewables, and public interest energy research.”⁶ While POU IRPs may inform IEPR topics, directly linking these IRPs to the IEPR is unnecessarily duplicative, burdensome, and has no basis in SB 350.

State policy makers are already able to track progress in meeting the state’s electricity sector GHG emission reduction target, both in aggregate and for individual compliance entities. As explained on the California Air Resources Board (CARB)’s website containing GHG facility and entity emissions data:

Under California’s Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR), industrial sources, fuel suppliers, and electricity importers must report their annual GHG emissions to the California Air Resources Board (ARB). For reporters subject to the California Cap-and-Trade Program, submitted data are verified by an ARB-accredited independent third-party verifier.⁷

As this information is already reported to another government agency, CARB, and available to the CEC, it is unnecessarily duplicative and burdensome to aggregate POU and investor owned utility (IOU) IRPs via the Commission’s IEPR for the purpose of allowing policy makers to track progress in meeting the state’s GHG targets.

SB 350 contains no legislative direction to incorporate local IRPs into the state IEPR, or even link them. They are separate processes. There is absolutely no mention of IEPR in PUC 9621 and 9622, which are the only sections of SB 350 dealing with POU IRPs. SB 350 specified “a process for updating the plan at least once every five years,” not a process for updating POU IRPs every four years; yet, it is the latter schedule which would have coincided with the quadrennial IEPR.

Roseville fully supports using its IRP to inform state policy makers of its strategies and plans to achieve California’s renewable procurement and energy efficiency goals. Prior to SB 350, Roseville’s [2012 IRP](#) has been publicly available for years, and addresses virtually all of the topics enumerated by SB 350 except for transportation electrification and energy storage. Both of these topics will be addressed in Roseville’s next IRP, and would have been addressed in its IRP as part of a routine and prudent utility planning process, regardless of SB 350’s requirements.

POU IRPs serve as locally approved planning documents, rather than a means to provide data for separate state reports. Excessively detailed and prescriptive IRP review guidelines recommending the inclusion of data irrelevant to a POU’s planning needs is problematic. Conflating local IRPs with the state IEPR in the discussion document undermines the governing authority’s ability to identify and understand the facts and analysis underpinning a POU’s resource planning, results in a state reporting document divorced from its original purpose as a local planning guide, and- as explained in the following section- results in an unnecessary burden on POU staff, in contravention of the guidance provided in Public Resources Code (PRC) 25320.

⁶ <http://www.energy.ca.gov/energypolicy/>

⁷ <https://www.arb.ca.gov/cc/reporting/ghg-rep/reported-data/ghg-reports.htm>

c. The Commission should obtain information for the IEPR consistent with existing regulations, including “in the most cost-effective and efficient manner.”

While it is both not the stated intent of SB 350 to subsume local IRPs within the IEPR, and contrary to the purpose of IRPs to do so, Roseville can provide information for the Commission’s IEPR according to existing legislative and regulatory requirements. In fact, Roseville has annually provided timely and complete information for the IEPR and for numerous other reports which it provides to the Commission. Roseville is happy to comply with the Commission’s IEPR data requests, separate from the SB 350’s requirements for POU IRPs, consistent with PRC 25320.

In the discussion document, the Commission states that PRC “25320 provides the Energy Commission with broad authority to request necessary data for developing policy reports and analyses in the IEPR.”⁸ However, PRC 25320(a)(1) also states that “It is the intent of the Legislature to ensure that information... is obtained from stakeholders in the most cost-effective and efficient manner.” PRC 25320 encourages the Commission to:

- “Eliminate unneeded and duplicative data submittals from stakeholders.”⁹
- “Give full consideration to the potential burdens these data requests impose on the resources of the stakeholders whose information is being requested.”¹⁰
- “Require a person to submit only information that is necessary to the development of the integrated energy policy report and analyses, and that the person can either be expected to acquire through his or her market activities, or possesses or controls.”¹¹
- “To the extent it satisfies the information needs of the commission, rely on the use of estimates and proxies, to the maximum extent practicable.”¹²
- “To the extent it satisfies the information needs of the commission, rely on data, to the maximum extent practicable, that is reported to other government agencies or is otherwise available to the commission.”¹³

Based on the discussion document, Roseville will address each of these areas in turn.

Roseville notes that it will treat “encouragements” in the discussion document as proposed guidelines and therefore germane. Also, while guidelines are unneeded for the Commission to review the areas enumerated under PUC 9621(c)(1), and therefore beyond the authority granted to the Commission in PUC 9622, Roseville will address some of them to illustrate its more general concerns with the Commission’s current approach to its proposed guidelines.

i. The Commission should avoid requesting unneeded and duplicative data submittals, particularly for reports already provided to the Commission or other agencies.

⁸ http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-07/TN216088_20170217T124906_DRAFT_STAFF_PAPER_Proposed_Guideline_Topics_for_Publicly_Owned.pdf, page 6.

⁹ PRC 25320(a)(2)(B)

¹⁰ PRC 25320(a)(2)(C)

¹¹ PRC 25320(b)(2)

¹² PRC 25320(b)(3)

¹³ PRC 25320(b)(4)

In a recent webinar on March 14, 2017, it was asserted that only “forward looking” reports would be relevant for streamlining any existing reporting requirements the POU IRPs. Roseville respectfully notes that many “backward looking” reports, such as the joint SB 1037 report on energy efficiency, are submitted annually to the CEC and contain not only forward looking elements such as 10-year POU energy savings targets, but information for programs or contracts that will generally continue well into the future.

In the interest of transparency, as part of- or as an appendix to- the proposed guidelines, it would be helpful for the Commission to disclose the reports it has reviewed as potentially duplicative or overlapping with the IRPs, as well as an explanation of its determination of whether these reports can actually be used to streamline existing reporting requirements with any potential POU IRP review guidelines. POU’s would then be able to provide feedback once the guidelines proposed by the Commission are released.

Roseville urges the Commission to coordinate both internally and with other agencies to identify and review any reports potentially duplicative of the information the Commission is seeking for its IEPR, as well as review the POU presentations at the first POU IRP workshop.¹⁴ The table Roseville provides below is a partial sampling of the reports it provides to the Commission and other agencies.

¹⁴ <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?doctnumber=16-OIR-01>. Redding and NCPA/SCAPPA presentations list potentially duplicative documents; other presentations may list other potentially duplicative documents.

Table 1: Potentially Duplicative Reports Overlapping Areas Enumerated in SB 350

Area	Report	Due Date & Frequency	Description
All areas required by SB 350	Roseville's IRP	2012, Every five years	Most recent IRP is from 2012, and did not address transportation electrification or energy storage. Next IRP expected to be completed in 2017.
GHG	MRR	June 1, annually	CARB GHG emissions report.
GHG	EIA 923	Monthly or annually	GHG emissions can be derived from the generator and fuel data reported for all U.S. generators.
RPS/Diversified Portfolio/GHG	Power Content Label*	October 1, annually	This is a less detailed, more consumer-friendly version of SB 1305. AB 1110 requires additional GHG reporting and is currently being implemented.
RPS/Diversified Portfolio	SB 1305*	June 1, annually	Provides detailed kWh information about generation resources.
RPS	RPS Compliance Report*	July 1, annually	For annual retail sales determining REC obligation and REC retirement. Appears unavailable on CEC website.
RPS	SB 1 Solar Report*	July 1, annually	Established 2015, reports the progress of a POU's solar incentive program.
RPS	CEC 1306A*	February, May, August, and November 15 quarterly	For solar greater than 100 kW; provides electricity delivered monthly to end-use customers. Used in analyzing electricity demand for local planning and state energy forecasts.
EE	Form CEC-1311*	March 15 annually	Publicly Owned Electric Utilities' Energy Efficiency Programs. Not online
EE	SB 1037 Report*	March 15, annually	Reports public benefit programs/results; summarizes EE programs, power partners. Implements AB 2021; includes Form CEC-1311.
EE	DOE EIA 861	April 1, annually	Peak load, generation, electric purchases, sales, revenues, customer counts, DSM programs, green pricing, NEM programs, and DG capacity.
Energy Storage	AB 2514*/PUC 9506	January 1, 2017 and 2022	Describes energy storage system procurement targets and policies adopted, if any.
Diversified Portfolio	CEC 1304*	February, May, August, and November 15 quarterly	Provides information on gross generation, net generation, fuel use by fuel type for generators, etc.
Various	IEPR*	April 2017, biennial	Capacity resource accounting, energy balance 10 year forecast, bilateral contracts
Other	CEC 1368*	See website	Emission Performance Standards
Other	CEC 1306C*	January and July 31, annually	For power plants (includes all distribution units that distribute electricity to customers)

* Report is submitted directly to the CEC

The GHG Emissions Accounting Table proposed by the Commission¹⁵ is unnecessary, duplicative, and burdensome. It should not be forced into IRPs that do not already collect and report substantially similar data. Historical facility emissions and entity GHG emissions related to electricity imports are already reported to CARB and made publicly available.¹⁶ Furthermore, total GHG emissions for individual electric utilities will also be available via the annual Power Content Label submitted to the Commission after AB 1110 is implemented.

Regarding emissions factors for some individual generators, they are available in the “EF List” tab of the workbooks used by electric power entities to report imported and exported power,¹⁷ while a default emissions factor of 0.428 MT of CO₂e/MWh already exists for unspecified system resources. Finally, publicly available data relating to energy generation and fuel use for both in-state and out-of-state resources are reported to the federal government via Form EIA-923, and can be used to derive GHG emissions and GHG emissions factors.

ii. There are numerous proposed guidelines in the discussion document which are unnecessarily burdensome

Despite the direction of PRC 25320 to give “full consideration to the potential burdens these data requests impose on the resources of the stakeholders whose information is being requested,” there was no consideration in the discussion document of the additional burden POUs would shoulder. Were the Commission to enact its guidelines without consideration of the additional ratepayer cost and burden imposed by the guidelines, its compliance with PRC 25320 would be unclear.

There are numerous proposal guidelines within the discussion document which are problematic for various and sometimes multiple reasons: conflicts with existing reporting requirements and/or deadlines, information which POUs cannot reasonably be expected to have or produce in the regular course of their business, and proposals to demonstrate consistency with mandates unrelated to local planning.

1. The Commission should identify and resolve conflicts with other reporting requirements and/or deadlines

Section 2.c.i of Roseville’s comments provide the Commission a number of examples of potential duplication with existing reports and resulting reporting and/or deadline conflicts. Roseville provides the following two detailed examples of a reporting requirement conflict and a reporting deadline conflict. In order to minimize the additional reporting burden on POUs, avoid unneeded and duplicative data submittals from POUs, and rely on information already available to the Commission per PRC 25320, the Commission should proactively identify and resolve such conflicts.

On page 23 of the discussion documents, the proposed guidelines seek annual reporting for the Capacity Resource Accounting table. Roseville already reports EE program data- such as savings, incentives, and administrative overhead- on a fiscal year basis in the SB 1037 report it provides to the Commission. If Roseville reformats its data from fiscal year to calendar year periods for its IRP, it will create an additional, unnecessary burden as well as confusion if compared to the SB 1037 report.

Additionally, while the deadline for submitting the IRP to the Commission for review is January 1, 2019, Roseville recommends delaying the IRP due date to April 30. The Commission has proposed basing its CRA and EBA tables on the IEPR’s S-1 and S-2 reporting tabs, respectively.¹⁸ Practically, with a

¹⁵ Page 15 of discussion document

¹⁶ <https://www.arb.ca.gov/cc/reporting/ghg-rep/reported-data/ghg-reports.htm>

¹⁷ <https://www.ccdsupport.com/confluence/display/calhelp/Reporting+Form+Instructions#EPE>

¹⁸ Pages 13 and 14 of the discussion document.

January deadline, POUs would need to rely on forecasted, rather than actual, data for the final months of 2018; IRPs would either utilize data that differs from what is submitted for S-1 and S-2, or resubmit the actual data later, resulting in an additional, unneeded reporting burden.

2. Information that the stakeholder cannot reasonably be expected to acquire through market activities, or possess, or control

Several Commission proposals are burdensome, and in some cases unrealistic, as they seek information which POUs cannot reasonably be expected to have or obtain through the normal course of their business, much less the development of their IRPs.

For example, on page 19 of the discussion document, “Staff encourages the POUs to develop a common set of assumptions regarding the cost and operating characteristics of battery storage and to use it to inform this discussion.” Roseville has several concerns regarding this proposal:

- There are multiple battery storage technologies optimized for different functions- coordinating such a set of assumptions for each year through 2030 would be complex and burdensome;
- Battery storage is a subset of energy storage; if the Commission meant for POUs to develop a common set of assumptions for energy storage, rather than just battery storage, this undertaking would be proportionately more complex and burdensome;
- Standardizing such a set of assumptions would be of questionable value for individual POUs. It is unlikely that all POUs will be plan to deploy the same energy storage technologies, at the same scale, at the same pricing, during the same IRP reporting cycle - if they are planning to use any energy storage at all;
- Any assumptions would likely become outdated as certain storage technologies mature or become more economical, resulting in a burdensome, endless cycle of updating these assumptions.

It is clearly beyond the role of POUs and beyond the purpose of local planning documents to develop unrelated information for the Commission. Also, as discussed in Section 2a of Roseville’s comments, such information is unneeded for the Commission to determine whether an IRP is in compliance with SB 350.

Another example is on page 15 of the discussion document: the Commission states that the “RPS Compliance Accounting Table is proposed to be a standardized reporting table that identifies the specific generator that contributes to RPS compliance in each year, the fuel source, and expected annual energy generation” through 2030. Additionally, on page 17, “Staff is proposing that IRPs include itemized resources procured to meet additional ramping, flexible capacity, and energy needs arising from the POUs’ renewables portfolios in 2030.”

Roseville may be reasonably expected to operate some of its existing resources- such as the natural gas-powered Roseville Energy Park- through 2030, and predict a range for its expected annual energy generation. However, it is both unreasonable and unrealistic to expect POUs to identify, nearly 15 years in advance, every individual resource which will contribute to RPS compliance in each year, for several reasons:

- The legislative and regulatory landscape is volatile. Roseville’s first transaction in its last IRP was invalidated within months of its approval, and other resources were contracted after the IRP was complete. In other words, the specific resources and strategies Roseville will use to meet its GHG and RPS obligations are likely to change;

- IOUs undergo Long-Term Procurement Plan (LTPP) proceedings, complex and comprehensive planning exercises which only have a 10 year planning horizon¹⁹ and do not require IOUs to specifically identify all of their resources and expected annual generation;
- This proposed compliance table implicitly ignores the role of Portfolio Content Category 3 (PCC3) products in RPS compliance;
- RPS compliance instruments include short-term PCC 1, 2, and 3 products- which, by their very nature, cannot be specified more than 10 years in advance- at best;
- The contribution of transportation electrification (specifically vehicle-to-grid) and storage to RPS compliance would be extremely complex and burdensome, if not impossible, to calculate at this time.

Generic- not specific- resource assumptions will be used by most, if not all, POUs forecasting their RPS resources through 2030. Roseville's generation resources are only contracted through the mid 2020's. Accordingly, it is even more unreasonable and unrealistic to expect POUs to identify specific resources needed to support indeterminate renewable resources.

3. Inappropriately seeking local accountability for state agency mandates

As previously discussed in Section 2a of Roseville's comments, the Commission has a limited scope in adopting guidelines to review POU IRPs. Specifically, regarding those areas enumerated under PUC 9621(c)(1),²⁰ guidelines to govern the submission of information and data and reports are not needed to support the Commission's review and would be beyond the authority granted to the CEC by SB 350. As the proposed guidelines are unneeded and beyond the authority granted to the CEC by SB 350, Roseville will not discuss all of the Commission's proposed guidelines in these areas. However, there is one proposal which illustrates Roseville's concerns regarding the inappropriate conflation of state IEPR issues with local planning documents.

On page 22 of the discussion document, the Commission proposes POUs discuss "How the IRP is consistent with statewide goals and policies, such as Executive Order B-16-2012 that set a target for 1.5 million zero-emission vehicles on the road by 2025." Respectfully, while Roseville's IRP will discuss its initiatives and programs to advance transportation electrification, both as a matter of planning and for compliance with SB 350, POUs were not the entities charged with facilitating this Executive Order.²¹

A local planning document is simply inappropriate for discussing POU "consistency" with a mandate to state agencies which does not mention, much less assign targets or goals for, POUs. However, the Commission may utilize the information in Roseville's IRP as it relates to this executive order and similar statewide goals.

3. Conclusion

Roseville intends to comply with SB 350 as well as any IEPR data requests received from the Commission. Reviewing the guidelines proposed in the discussion paper, Roseville believes there is an opportunity for the Commission to develop more effective IRP guidelines if it keeps the following principles in mind:

¹⁹ With a 20 year, non-procurement forecast for determining general trends.

²⁰ Energy efficiency, demand response, energy storage, transportation electrification, and a "diversified procurement portfolio consisting of both short-term and long-term electricity, electricity-related, and demand response products."

²¹ <https://www.gov.ca.gov/news.php?id=17472>

- POU's are local utilities and POU IRPs are local planning documents; any proposed guidelines seeking information should not distort their role and purpose, respectively.
- Guidelines are not needed for the areas enumerated in PUC 9621(c)(1), as simply addressing procurement in these areas is sufficient be consistent with the requirements of PUC 9621.
- The need for any proposed guidelines to help the Commission review whether a POU IRP is consistent with PUC 9621(b) should be clearly explained.
- There is no written basis in SB 350 to link POU IRPs to the Commission's IEPR, much less subsume them into the state IEPR. They are separate processes. Roseville is unaware of a clear and compelling case for conflating local IRPs with the IEPR. Given the misalignments between POU IRPs and the IEPR, IRP guideline development should be restored to its original proceeding.

Whether or not the Commission chooses to separate the IRP from the IEPR, Roseville suggests that any IEPR data requests adhere to the following guidelines in order to remain consistent with PRC 25320:

- Coordinate internally, with stakeholders, and with other state agencies to obtain any needed information, particularly for information which already exists.
- Do not request duplicative information that is already available to the Commission, other government agencies, or the general public.
- Avoid reporting requirements and deadlines which conflict with existing reporting requirements and deadlines.
- Do not ask for information which POU's and POU IRPs cannot be reasonably expected to have, obtain, or develop. This includes consistency with mandates on state agencies for which there are no POU targets or goals.

Roseville is currently developing its IRP and expects to complete it within a year. Roseville welcomes the Commission staff to speak with its staff. Roseville can explain how it forms its IRP and how its IRP is structured to make decisions that address Roseville's key challenges to make a reliable, cost effective, comprehensive, and compliant electricity portfolio.

4. Reply to Commission Questions

While Roseville has not responded to all of the questions posed in the discussion document, it reserves the right to address these topics at a later point in time.

1. Is it appropriate to require that supporting analysis for IRPs be undertaken in the 24 months prior to adopting an IRP? Is there an alternative time frame that is more appropriate?

No.

1) As a matter of routine and prudent planning, POU's will always use the most recent and relevant data and analysis available in developing their IRPs; such information will generally be more recent than 24 months.

2) Such a proposed guideline could result in an additional, unneeded burden to POU's in updating otherwise valid information just outside the 24 month window. An example of this is the AB 2514 storage report, which POU's submit to the Commission. The final report is due in January 1, 2022; were the Commission to streamline IRP submittal with submittal of IEPR data by changing the former's deadline from January 1, 2024 to April, 2024, the AB 2514 report would be 28 months old, and "outdated" for the purposes of such a proposed guideline.

2. Are there select areas of analysis that should be exempt from meeting this 24- month requirement because of the analysis is not time-dependent?

See previous answer.

4. SB 350 requires updates “at least once every five years.”

a) Is it appropriate to require IRPs be adopted and submitted to the Energy Commission every four years to consolidate and leverage other similar requirements?

No. See Section 2.b of these comments.

b) Are there existing reporting requirements that could potentially be combined with the IRP?

Yes. See Section 2.c.i.2 of these comments.

5. Stakeholders have requested an optional “informal review” process of an IRP by the Energy Commission prior to an official submittal.

a) What are the benefits or concerns of including an optional informal process in the guidelines?

b) What questions, issues, or practices should this informal process address?

c) What is the scope of the review?

Roseville strongly objects to an “optional ‘informal review’ process” for its IRP and believes there is no benefit to it. There is no language in SB 350 that provides for an “optional ‘informal review’ process” for outside stakeholders. Only the CEC has been granted authority to review IRPs for consistency with SB 350, per PUC 9622(b). Such a review process would be beyond the intent of SB 350 and undermines the local governing authorities which adopt IRPs. Stakeholders may provide input at city council or independent board meetings where IRPs are presented to local authorities for approval.

6. Staff requests public input on the following options to address this as well as other potentially duplicative reporting requirements. Below are some options that staff is considering:

a) Two submission dates:

i. Adopted IRPs would be due to the Energy Commission by January 31.

ii. Data forms would be due April 30.

b) Delay IRP due date until April 30.

c) Require that the POU's submit their IRPs by January 31 and Electricity Resource Plans by May

Option b). See Section 2.c.ii.1 of these comments.

8. How should flexibility needs be presented and discussed in the IRP?

Flexibility needs should be presented and discussed in the IRP according to the individual planning needs of the POU's. The Commission should not propose prescriptive guidelines that are beyond the intent of SB 350 and/or interfere with the purpose of IRPs as local planning documents allowing POU's to plan for the future electricity needs of their ratepayers.

10. Is the ARB's emissions intensity of 0.428 mt CO₂e/MWh appropriate for spot market purchases and/or energy from unspecified sources under long-term contract? If not, how should a new value be determined?

It is unclear if this number is appropriate. This emissions intensity is outdated and Roseville recommends the CEC coordinate with the CARB on determining an appropriate new value, as it is part

of their mission and organizational expertise to do so. CARB is likely to have the information necessary to update this value, if warranted.

17. Should staff require a standardized assumption for GHG allowance/carbon costs, and if so, what assumption should be used? Which metric should be used, carbon cost or GHG allowance?

Roseville again reminds the Commission that any proposed guidelines are not “requirements,” and in any case must not exceed the authority granted by PUC 9622. Roseville suggests coordination and consultation with CARB in order to develop any such assumptions, if warranted.