

DOCKETED

Docket Number:	17-IEPR-07
Project Title:	Integrated Resource Planning
TN #:	217742
Document Title:	SDG&E Comments on May 12 IEPR Workshop
Description:	N/A
Filer:	System
Organization:	SDG&E
Submitter Role:	Public
Submission Date:	5/25/2017 4:25:28 PM
Docketed Date:	5/25/2017

Comment Received From: Jennifer Wright

Submitted On: 5/25/2017

Docket Number: 17-IEPR-07

SDG&E Comments on May 12 IEPR Workshop

Additional submitted attachment is included below.



Tim Carmichael
Agency Relations Manager
State Government Affairs

925 L Street, Suite 650
Sacramento, CA 95814
Tel: 916-492-4248
TCarmichael@semprautilities.com

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Comments on 2017 Integrated Energy Policy Report, Docket Number: 17-IEPR-07, Joint Agency Workshop on the Increasing Need for Flexibility in the Electricity System

Dear Chairman Weisenmiller and fellow Commissioners:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to submit comments in response to the California Energy Commission's (CEC) 2017 Integrated Energy Policy Report (IEPR) Joint Agency Workshop on the Increasing Need for Flexibility in the Electricity System held on May 12, 2017.

Electric vehicles (EV) are a key tool to reducing greenhouse gas (GHG) emissions in California and meeting the state's goals articulated in Assembly Bill 32, Senate Bill 32 and Senate Bill 350. This is most apparently achieved by the displacement of polluting fuels such as gasoline and diesel. EVs have the added benefit of being a tool for California and California agencies to integrate renewables.

During the May 12, 2017 workshop, the California Independent System Operator (CAISO) discussed the expected increase in renewable generation, behind-the-meter solar and the fact that the "duck curve" is four years ahead of the CAISO's original estimate. These facts, as well as potential legislation to further increase renewable targets, create challenges and opportunities.

Strategic and proactive EV integration can be a solution and powerful tool. Conversely, lack of foresight may cause greater strains on the CAISO grid while discarding a potential tool – the flexible load of EVs. Proactive integration takes advantage of opportunities including management of oversupply and minimization of renewable curtailment. Accurate rates also aid in this goal. As supported by SDG&E's Final Evaluation for San Diego Gas & Electric Plug-In Electric Vehicle TOU Pricing and Technology Study, dated February 20, 2014, individual customer behavior is influenced by TOU rates and rate signals resulting in beneficial charging behavior. Beneficial behavior is expected to be further enhanced with SDG&E's vehicle grid integrated (VGI) rate, which is a day-ahead hourly rate that includes price adders to reflect the

top 200 circuit hours and top 150 system hours to minimize increased peak load. Additionally, technology such as stationary storage and software to enhance integration can further assist in renewable generation to the benefit of stakeholders.

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ Tim Carmichael

Tim Carmichael
Agency Relations Manager
San Diego Gas & Electric