

October 28, 2010

California Energy Commission
Docket Office, MS-4
Docket No. 11-IEP-1C
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DOCKET

11-IEP-1C

DATE OCT 28 2010

RECD. OCT 28 2010

Re: California Energy Commission (Energy Commission) Docket #11-IEP-1C Demand:
Comments Regarding Staff Workshop on Electricity Demand Forecast Data Collection and Analysis

To Whom It May Concern:

Southern California Edison Company (SCE), Pacific Gas & Electric Company (PG&E) and Sempra Energy (collectively referred to herein as the “Utilities”) appreciate the opportunity to provide joint written comments based on the Staff Workshop on Electricity Demand Forecast Data Collection and Analysis held on October 14, 2010 (the Workshop) regarding the forms and instructions to be submitted as part of the 2011 Integrated Energy Policy Report proceeding (IEPR).

In the Energy Commission’s Draft Staff Report: Forms and Instructions for Electricity Demand Forecasts, dated October 2010, the Energy Commission established a March 30, 2011 due date for all 2011 Demand IEPR forms. As we explained at the Workshop, the March 30, 2011 deadline for all demand forms would be difficult to reach, for three reasons.

First, because the Energy Commission has asked that the demand forecast forms (Forms 1-6 and Form 8, the Demand Forms) be based on an entire year of settlement data for the calendar year of 2010, the raw data required to complete the Demand Forms will not even be available to the Utilities until early March 2011 and such data will need to be compiled and analyzed prior to submission by the Utilities.

Second, in order to complete the Demand Form 8, each Utility will have to prepare the comprehensive resource plan that is required to prepare Forms S-1, S-2 and S-5 (the Supply Forms). In the Workshop, the Energy Commission Staff indicated the potential for separating Demand Form 8 and delaying the submittal date to allow time to prepare the Supply Forms.

Third, the Utilities would prefer that the IEPR proceeding schedule be coordinated with the California Public Utilities Commission’s (CPUC) Long-Term Procurement Plan proceeding (LTPP),

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to the extent feasible. The CPUC has not yet issued a scoping memo for the LTPP, so the schedule for that proceeding is uncertain. By extending the due dates under the IEPR, the two proceedings may occur in tandem, thereby minimizing redundancy in the data collection requirements for the two proceedings and helping to ensure common LTPP/IEPR data methodology and inputs. On this point, the Utilities recognize that the Energy Commission must collect data and analyze it in time to meet the November 2011 deadline for submittal of the final IEPR report, regardless of the LTPP schedule. Further coordination between the state agencies would seem beneficial in resolving this issue.

At the Workshop, the Energy Commission indicated its willingness to work collaboratively with the utilities with respect to these scheduling issues. Accordingly, the Utilities recommend extending the schedule for submission of the IEPR forms as follows:

<u>Data Collection Item</u>	<u>Recommended Due Date</u>
Demand Forms 1-6	April 15 th , 2011
Supply Forms	May 13 th , 2011
Demand Form 8 (Retail Price and Rate Forms)	June 3 rd , 2011

Submittal of the Demand Forms in mid-April will facilitate the use of a full year of settlement data for the 2010 calendar year. Submittal of the Supply Forms in May might facilitate coordination with the LTPP proceeding without materially delaying the IEPR proceeding. The June 3rd date will allow three (3) weeks' time from the completion of the Supply Forms for the Utilities to complete Form 8.

If you have any questions or need additional information about these written comments, please contact Manuel Alvarez at (916) 441-2369, Mark Krausse at (916) 386-5709 or Tim Vonder at (858) 654-1735.

Very truly yours,

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