

DOCKETED

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Sunrun Comments on Energy Demand Forecast Workshop

Additional submitted attachment is included below.



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July 24, 2018

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 18-IEPR-04
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments in response to the 2018 Integrated Energy Policy Report Update (IEPR Update) Workshop on the Energy Demand Forecast Update, 18-IEPR-04

Sunrun Inc. (Sunrun) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) workshop on the 2018 California Energy Demand Forecast Update held on July 10, 2018.

About Sunrun

Sunrun (Nasdaq:RUN) is the nation's largest residential solar, storage and energy services company. With a mission to create a planet run by the sun, Sunrun has led the industry since 2007 with its solar-as-a-service model, which provides clean energy to households with little to no upfront cost and at a saving compared to traditional electricity. The company designs, installs, finances, insures, monitors and maintains the systems, while families receive predictable pricing for 20 years or more. The company also offers a home solar battery service, Sunrun Brightbox, that manages household solar energy, storage and utility power with smart inverter technology. For more information, please visit: www.sunrun.com.

Discussion

The Integrated Energy Policy Report (IEPR) plays a key role in energy planning in California. The IEPR demand forecast informs the State's load-serving entities' (LSEs') integrated resource planning, as well as the California Independent System Operator's (CAISO's) Transmission



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Planning Process. As such, IEPR's energy demand forecast supports the transition away from fossil fuels to clean energy.

Distributed clean energy resources are uniquely suited to serve local capacity needs. They can be sited directly where local capacity is required and can be scaled in subsequent years in relation to changing demand. For example, in transmission constrained areas, solar generation paired with storage can provide renewable energy and peak load reduction, thereby alleviating the need for peaking generation capacity or new transmission lines, as well as provide ongoing local generation in the event of a transmission contingency.

The LSEs and the CAISO have provided opportunities to use behind-the-meter solar paired with storage as a grid planning and operational asset through various competitive energy procurement solicitations. However, use of rooftop solar for the above purpose has been hindered because it is unclear the degree to which the IEPR is already predicting solar capacity growth in local areas.

While the IEPR historically has not been a locally-derived forecast, it is being extrapolated down to local areas for the purposes of determining resource eligibility within LSE procurement. As a result, local solar generation is being excluded as non-incremental to the IEPR, even though the IEPR itself makes no assertion regarding specific solar development in these local areas.

The IEPR is a forecast incorporating broad market trends and the IEPR makes no forecast of deployment of specific resources separate from overall market trends. The procurement of rooftop solar, for example, for local capacity purposes, is distinct and not forecasted by the IEPR, because it is a contract undertaken by a third party directly with an LSE. The IEPR does not take into account specific programs unique to local areas, such as added value that would drive increased deployment. Therefore, Sunrun requests the CEC affirm that rooftop solar procured for local capacity purposes is incremental to any behind-the-meter solar that is forecasted in the IEPR.

Further, it is important the CEC uses more granular data in its IEPR Energy Demand Forecast so that distributed energy resources can better provide solutions to help optimize the grid and help the State meet its long-term greenhouse gas reduction goals. Sunrun was pleased to hear that the CEC is working with the National Renewable Energy Laboratory (NREL) on adapting NREL's Distributed Generation Market Demand Model to inform the IEPR Energy Demand Forecast at the July 10 workshop. To promote the procurement of distributed energy resources for local capacity purposes, Sunrun proposes the IEPR include local areas in future Energy Demand Forecasts, with the methodology used to apply the statewide forecast to local areas made publicly available and transparent to external stakeholders.



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Conclusion

As discussed above, Sunrun proposes the CEC consider the following modifications through the current or subsequent IEPR:

- Affirm that rooftop solar procured for local capacity purposes is incremental to any behind-the-meter solar that is forecasted in the IEPR in order to clarify the deployment of specific resources separate from overall market trends.
- Include local areas in the IEPR's future Energy Demand Forecasts, with the methodology used to apply the statewide forecast to local areas made publicly available and transparent to external stakeholders in order to further promote the procurement of distributed energy resources for local capacity purposes.

By incorporating these modifications, the IEPR can increase its effectiveness in promoting cost-effective grid planning and clean energy deployment, as well as help address evolving grid needs for local capacity with the most efficient and beneficial resources.

Sunrun appreciates the opportunity to provide comments and looks forward to continued participation in the IEPR process.