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*Comment Received From: Valerie Winn*  
*Submitted On: 12/28/2018*  
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**Pacific Gas and Electric Co\_Demand Forecast**

*Additional submitted attachment is included below.*

December 28, 2018

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DOCKET 18-IEPR-04**

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

Re: Docket 18-IEPR-04: Pacific Gas and Electric Company Comments on the Draft 2018 California Energy Demand 2018-2030 Forecast Update

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) California Energy Demand (CED) 2018-2030 Forecast Update. The CED Forecast is a critical component of the Integrated Energy Policy Report (IEPR) and an essential tool for planning future energy policies across numerous agencies. Given this importance, PG&E appreciates the continued efforts of CEC Staff to discuss and refine components of the 2018-2030 Forecast with stakeholders through the Demand Analysis Working Group (DAWG).

PG&E has three comments regarding the 2018 CED Forecast Update in addition to future forecasts:

- I. **PV Generation Profiles:** PG&E recommends the CEC update the photovoltaic (PV) generation profiles used in its forecast. These generation profiles are based on a confidential and outdated study from 2012, which hinders the transparency and accuracy of the PV forecast.
- II. **CCA Forecasts:** As identified to the CEC on August 15, 2017 and February 2, 2018, PG&E reemphasizes the need to revisit forecast methodology around Community Choice Aggregation (CCA). Although the CCA forecast was not part of this year's update, it is an important component of the forecast and the CEC should fundamentally revisit its methodology when developing the 2019 CED Forecast. Developing sound forecasts of CCA load is critical given the increased load shift to CCAs<sup>1</sup> and the use of the CEC's forecasts to establish compliance and procurement targets such as in the California Public Utilities Commission's Integrated Resource Planning process.

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<sup>1</sup> PG&E forecasts more than 50% of the energy on its system in 2019 will be served by CCAs or direct access providers. See PG&E's Update to Prepared Testimony 2019 Energy Resources Recovery Account and Generation Non-Bypassable Charges Forecast Application 18-06-001, Nov. 7, 2018.

The CEC's current forecast methodology assumes CCA load grows at the same rate as the incumbent utility. This assumption has failed to capture the significant expansion of CCAs over the past few years. PG&E recommends the CEC revise its CCA forecasting framework to include significant near-term known events and to appropriately capture future formation and/or expansion of CCAs.

For more detailed information regarding PG&E's concerns with the CCA forecast, refer to *Docket 17-IEPR-03: Pacific Gas and Electric Company Comments on the California Energy Demand 2018-2030 Revised Forecast, Part I*, published on February 2, 2018. PG&E looks forward to working closely with the CEC during the 2019 IEPR to address these concerns and improve the CCA forecast.

- III. Stakeholder Review Process: PG&E would like to stress the importance of working on the CED stakeholder review process to give stakeholders more time to review the final forecast in detail. This will be especially important in 2019 given PG&E's concerns regarding the CCA and PV generation forecasts which will likely be updated in the 2019 CED Forecast.

PG&E appreciates the opportunity to provide comments on the California Energy Demand 2018-2030 Forecast Update and looks forward to providing input and working with the CEC on future forecasts.

Sincerely,

/s/

Valerie J. Winn