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PG&E Comments on IEPR Workshop on Inputs and Assumptions

Additional submitted attachment is included below.



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California Energy Commission
Commissioners Patty Monahan, Andrew McAllister, and Siva Gunda
1516 9th St
Sacramento, CA 95814
Docket Number 21-IEPR-03

RE: Pacific Gas and Electric Company Comments on the Integrated Energy Policy Report (IEPR) Commissioner Workshop on Data Inputs and Assumptions for 2021 IEPR Modeling and Forecasting Activities (Docket Number 21-IEPR-03)

Dear Commissioners Monahan, McAllister and Gunda:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment in response to the California Energy Commission's (CEC) 2021 Integrated Energy Policy Report (IEPR) Commissioner workshop on data inputs and assumptions for 2021 IEPR modeling and forecasting activities held on August 5, 2021.

PG&E applauds the CEC's efforts in organizing this workshop and offers the following comments on the CEC's forecasting methodologies regarding transportation and building electrification:

1- PG&E Supports the Additional Scenarios in the Transportation Forecasting

PG&E supports the CEC transportation forecasting team's efforts to develop exploratory scenarios that reflect additional policy drivers of electric-vehicle (EV) adoption, such as Governor Gavin Newsom's Executive Order N-79-20 and the Advanced Clean Trucks Regulation. While these policies sometimes fall outside the scope of the CEC's current consumer-choice forecasting methodology, PG&E considers such policies to be essential drivers of future EV adoption. Consequently, including such policy drivers in a forecast substantially strengthens efforts to effectively plan for California's future energy system.

PG&E supports the CEC including such policy-based scenarios among their IEPR scenarios to more clearly demonstrate how the CEC's consumer-choice scenarios compare to policy-based scenarios. Additionally, PG&E supports the CEC developing scenarios that illustrate likely paths to reach the N-79-20 targets for medium-and-heavy-duty vehicles—100 percent of vehicles in the state are zero-emission by 2045 for all operations—and comparing such scenarios to the CEC's consumer-choice scenarios. Although the N-79-20 medium-and-heavy-duty target extends past the CEC's 2035 forecast time horizon, reaching that

target would likely require material market transformation that would be visible within the CEC's forecast time horizon.

2- PG&E Supports the Fuel Substitution Approach in the Building Electrification Forecast

PG&E supports the CEC's plans for refining and expanding fuel substitution (building electrification) modeling in its forecast. Developing additional achievable fuel substitution (AAFS) as an hourly load modifier to the baseline demand forecast will make underlying assumptions transparent. PG&E also supports the CEC's proposed approach where the main objective of developing AAFS is to focus on firm programs and projections since the core scenarios will be used for planning and procurement purposes.

In addition to this, developing variations (alternative AAFS scenarios) around the most probable future to show other possible outcomes will help decisionmakers understand the uncertainties associated with building electrification.

PG&E appreciates the opportunity to comment on this IEPR workshop and to share our perspective on the forecasting methodologies. Please reach out to me if you have any questions.

Sincerely,

Licha Lopez
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