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SoCalGas Comments on Energy Demand Analysis

Additional submitted attachment is included below.



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January 11, 2022

California Energy Commission
Docket Unit, MS-4
Docket No. 21-IEPR-03
715 P Street
Sacramento, CA 95814-5512

Subject: Comments on the Commissioner Workshop on Energy Demand Analysis

Dear Heidi Javanbakht, Ingrid Neumann, and Ethan Cooper:

On behalf of Southern California Gas Company (SoCalGas), we thank you for the opportunity and willingness to meet over the holiday season to further discuss the California Energy Commission's (CEC's) approach to conducting analyses for the natural gas demand forecast and fuel substitution. Accurate forecasting is vital for mid- and long-term planning, and is therefore, an essential component of the State's energy management and plan for achieving greenhouse gas emission targets and energy reliability.

It is clear the CEC has a robust electric demand forecast as it has been one of the agency's core functions for the past 45 years or so. Much of this success has come through close engagement with the electric utilities (both investor-owned and publicly owned), year over year iterations to improve the forecast, and access to greater and more granular data. Given this and the CEC's expressed interest in digging more into the intricacies of natural gas demand forecasting, SoCalGas is interested in partnering with the CEC to share our expertise. We believe fostering a knowledge-sharing relationship is a key aspect to a robust 2023 IEPR demand forecast. Additionally, we are exploring how to incorporate fuel substitution in our demand forecast and would like to collaborate with the CEC to discuss the process for doing so and exchange our respective experiences.

One way to start some of these discussions could be to establish a natural gas Demand Analysis Working Group (DAWG) that would provide an environment for planners and forecasters to collaborate and more informally work through data and knowledge gaps. SoCalGas would be interested in participating in such a gas-focused DAWG if it is created. Additionally, SoCalGas

suggests that collaboration could be increased by engaging the CEC with some of the working groups for the California Gas Report as led by the California Public Utilities Commission.

In closing, I thank you for allowing me to start the initial discussions on demand forecasting. Sharing knowledge and best practices will enrich agency deliberations and facilitate better outcomes that advance the public interest. I look forward to our partnership in the coming year.

Respectfully,

/s/ Kevin Barker

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