

DOCKETED

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**PG&E Comments on 2022 IEPR Update Electricity Resource
Planning Forms and Instructions**

Additional submitted attachment is included below.



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California Energy Commission
Vice Chair Siva Gunda
Docket Number 22-IEPR-03
715 P Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on the Electricity Resource Planning Data and Draft Forms and Instructions (Docket Number 22-IEPR-03)

Dear Vice Chair Gunda,

Pacific Gas and Electric Company (PG&E) appreciates the California Energy Commission (CEC) for hosting a webinar on April 13 to describe the draft forms and the information being requested as part of the 2022 Integrated Energy Policy Report (IEPR) update submittal, as well as giving PG&E the opportunity to provide feedback on these draft forms and instructions to collect electricity resource planning data from load-serving entities.

PG&E supports the collection of information on various aspects of the electricity resource plan and understands that the purpose of the supply forms is to improve the CEC's natural gas demand forecast.

PG&E seeks overall clarification from the CEC on the 2022 IEPR update data collection of the electricity resource data, the granularity of it, and the new information requested on the draft forms and instructions. PG&E also requests that the CEC provide some insight into their IEPR process and the timeline (September 2022 submittal) as some clarifications PG&E seeks below are related to the timing of this request and the overall alignment with other forms and data submitted under the IEPR proceeding both in 2021 and the upcoming 2023.

1- PG&E seeks overall clarification on the draft forms and instructions of the 2022 IEPR update compared to the upcoming 2023 full IEPR.

- For PG&E it is important to understand the use case of data that PG&E is being asked to submit as part of this 2022 IEPR update. PG&E seeks to better understand whether the data requested in the draft 2022 IEPR forms are an addendum to the 2021 IEPR previously submitted data or if these draft forms are intended to be an acceleration of the upcoming 2023 full IEPR submittal.

The reason why PG&E is seeking to better understand the data requested in the draft forms for the 2022 IEPR update is because PG&E's annual electric forecast development begins each year in the fall and concludes in the spring of the following year. That means, for the IEPR data

submission in odd-numbered years, the forecast submitted to the CEC is finalized in the spring of that year. Those forecasts reflect the most up-to-date information possible for the IEPR submission. It is particularly important to have the most recent information since the CEC's IEPR forecast considers this data to develop its own forecast, which is used for multiple years.

Because of this process, any forecast data PG&E would submit to the CEC in 2022, which is an even-numbered year, would not align with the forecast data planned for next year's 2023 IEPR submittal. PG&E could either (a) submit data that was produced for, and is consistent with, the 2021 IEPR; or (b) submit data developed in 2022 and not be consistent with either the 2021 IEPR data nor the upcoming 2023 IEPR submittal; or (c) the CEC could wait until 2023 for PG&E to send the most updated data in 2023.

- For example, although load forecast forms are not requested in this 2022 IEPR update, the supply forms include information related to the bundled load. It is not clear to PG&E if the bundled sales forecast from the 2021 IEPR forms PG&E filed in July 2021 is to be used to populate the bundled load. PG&E requests the CEC to clarify that the supply forms being requested in 2022 should be linked to load forecast forms with data from 2021. Here is the link to PG&E's load forecast data submission in July 2021 from the CEC Docket: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=239106-1&DocumentContentId=72554>.
- If this filing in 2022 is an acceleration of the 2023 IEPR submission, the load forecast PG&E will provide for the 2022 IEPR update won't be consistent with the 2021 IEPR submittal nor with the future PG&E's 2023 IEPR load forecast, which will not be final until the spring of 2023.
- Overall, it is unclear to PG&E how the IEPR supply forms can be requested in a different year than the IEPR demand forms. To better align with the CPUC's Integrated Resource Plan proceeding load serving entity's filing years (even-numbered years), PG&E prefers that the CEC wait until 2023 to collect these new data for consistency with the upcoming 2023 IEPR demand form submission. In the alternative, PG&E recommends that the CEC clarify that the 2021 data be submitted to remain consistent with information already provided to the CEC in 2021.

2- PG&E supports the submittal of monthly granularity for the first three years and seeks clarification from the CEC as to the goal of monthly forecast data.

- PG&E will be able to provide the requested monthly data of resources in form S-2, but proposes the monthly granularity be limited to the forward three years and then annual thereafter.
- PG&E seeks clarification as to the intended use of the more granular, monthly data.

3- New information requested in the draft 2022 IEPR forms:

Some information requested in the draft 2022 IEPR forms have potential impacts in energy contract management. Per the webinar held by the CEC on April 13 on the draft forms and instructions (and the forms posted on the IEPR website), PG&E seeks clarification on some data requests listed below:

- Location: The draft forms to be completed as part of the 2022 IEPR update include balancing authorities, and latitude and longitude. PG&E has this information and should be able to provide it. PG&E asks the CEC to clarify the data requested in the following fields:
 - a) Contracts involving multiple facilities.
 - b) Contracts in which there is no specified facility (e.g., resource adequacy (RA) confirms or bundled renewable portfolio standards (RPS) sale contracts). In these situations, some fields in the form may be left blank.
 - c) For the Balancing Authorities dropdown, PG&E proposes that a “non-applicable” option (“N/A”) and “other” option be added to the dropdown choices to address when inapplicable (such as Puget Exchange Agreement) or when valid balancing authorities are not included in the dropdown options.

- Report unbundled Renewable Energy Credits (RECs): The draft 2022 IEPR forms include the reporting of net result at the end of the year. PG&E has no unbundled RECs in its portfolio, and currently has no contracts in place for future delivery of unbundled RECs. PG&E recognizes that the CEC modified their definition of unbundled for the power source disclosure (PSD) report in a manner that currently counts three wind contracts located in Canada as being unbundled. However, these contracts are still considered bundled for renewable portfolio standards (RPS) compliance purposes. PG&E requests that the CEC clarifies what is considered as being unbundled for this 2022 IEPR update. If the unbundled RECs for line 7G in form S-2 would relate to new contracts where an entity intentionally only purchased RECs but not the associated power, then PG&E should report zero for all years.

- Nameplate capacity of resources (owned and contracted): PG&E does not track nameplate capacity; consistent with prior years, PG&E will report contract capacity.

- Incremental capacity addition to existing resource: The CEC draft 2022 IEPR forms request LSEs to indicate capacity amount and the year that is made. PG&E requests the CEC to provide clarity on what the CEC means by “capacity addition” and asks the CEC if this is related to the CPUC’s mid-term reliability order compliance.

- Transmission forms and instructions: PG&E requests further information on the transmission forms to be able to comment on and assess the availability of the data. Based on the draft forms (S-5) and instructions (stating “new transmission needed”) provided by the CEC, PG&E is unable to provide feedback or ask specific questions on this data request.

PG&E appreciates the opportunity to ask questions and clarify the information being requested under the 2022 IEPR update cycle and appreciates the CEC offering additional perspective on its data collection. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/

Licha Lopez