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One IEPR Commissioner Workshop on the California Planning Library

Additional submitted attachment is included below.

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE IEPR COMMISSIONER WORKSHOP ON THE CALIFORNIA PLANNING LIBRARY
April 27, 2022

Docket 22-IEPR-02
California Planning Library

The California Community Choice Association (CalCCA)[1] submits these comments as a follow-up to the *IEPR Commissioner Workshop on the California Planning Library* (the "Workshop"), conducted on April 27, 2022. CalCCA was one of the panelists at the Workshop, where it gave a high-level description of its requests.[2] The purpose of these comments is to give additional detail, context, and justifications for the requests CalCCA made at the workshop.

I. THE CALIFORNIA ENERGY COMMISSION (COMMISSION) SHOULD CREATE A SINGLE LOCATION TO ACCESS IMPORTANT DATA, ORGANIZED BY SUBJECT RATHER THAN REGULATORY PROCEEDING

The current Integrated Energy Policy Report (IEPR) process produces invaluable data for all stakeholders in the electric system planning process; including hourly electric load forecasts,[3] utility resource plans,[4] and a forecast of natural gas prices.[5] However, these data are currently organized by proceeding docket, and can be difficult to find if a stakeholder is not doing the time-

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[1] California Community Choice Association represents the interests of 23 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

[2] Located at : https://efiling.energy.ca.gov/GetDocument.aspx?tn=242816&DocumentContentId=76380

[3] Located at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-IEPR-03

[4] Located at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-IEPR-02

[5] Located at https://efiling.energy.ca.gov/GetDocument.aspx?tn=239648&DocumentContentId=73062

consuming work of actively monitoring those proceedings. Therefore, the Commission should create a single location that stakeholders can use to access the data, organized first by subject, then by specific item, and then by regulatory proceeding. This approach also minimizes regulatory burden, as it merely asks the Commission to compile and maintain a list of existing links to data. An example follows below.

Subject	*Specific Item*	*Proceeding*	*Link*
Electric Load Forecast	Hourly load forecast to 2030	21-IEPR-03	https://efiling.energy.ca.gov/GetDocument.aspx?tn=241174&DocumentContentId=75019
Electric Supply Plans	LSE supply plans (Form S-2)	21-IEPR-02	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239865&DocumentContentId=73307
Natural Gas Price Forecast	2021 IEPR preliminary burner-tip model	21-IEPR-05	https://efiling.energy.ca.gov/GetDocument.aspx?tn=239648&DocumentContentId=73062

In addition to the specific data items shown above, a table such as this could be accompanied by "release notes" that give a short description of the reasons for substantial changes in forecasts from version to version (for example, anomalous weather or an unforeseen decrease in economic output).

II. THE COMMISSION SHOULD PROVIDE DATA AND METHODOLOGY FOR THE "BUILDUP" PROCESS BY WHICH IT CONVERTS LOAD-SERVING ENTITY (LSE) -SUBMITTED ANNUAL LOAD MODIFIERS (SUCH AS BEHIND-THE-METER (BTM) RESOURCES, ENERGY EFFICIENCY, AND ELECTRIC VEHICLE (EV) CHARGING) QUANTITIES INTO HOURLY PROFILES IN THE IEPR LOAD FORECAST

As part of the IEPR process, LSEs submit estimated *annual* impacts of demand modifiers such as behind-the-meter photovoltaic solar (BTMPV), behind-the-meter battery storage, energy efficiency, EVs, demand response, and building electrification.[6] The Commission then aggregates and analyzes this information to convert these annual impacts into its hourly California Energy

[6] This information is contained in IEPR Form 3. The 2021 IEPR forms are located at: https://efiling.energy.ca.gov/GetDocument.aspx?tn=237369&DocumentContentId=70555

Demand forecasts of the production of these resources.[7] Presumably, the Commission uses an assumed hourly shape for the dispatch of these resources, but currently stakeholders have little visibility into what these shapes are and how they were developed. LSEs would find these shapes immensely useful for their resource plans and performing grid reliability modeling. Thus, the Commission should make them public at the most granular level possible under confidentiality rules.

III. THE COMMISSION SHOULD PROVIDE NARRATIVE DESCRIPTION, DATA ANALYSIS CODE, AND UNDERLYING DATA SHOWING THE BUILDUP OF ITS LOAD FORECAST

Currently, the Commission develops its hourly load forecasts using a combination of input data on weather, population growth, economic growth, and assumptions on penetrations of BTM resources. While some of the details of these processes are publicly available,[8] all stakeholders would benefit from increased visibility into the process by which this input data is converted to a forecast. CalCCA requests that the Commission make at least the list below public, so that stakeholders can benefit from the substantial work that the Commission has already completed:

- Historical and forecast data on weather, including:
  - Heating Degree Days
  - Cooling Degree Days
  - outdoor air temperature
  - dew point
  - precipitation
  - windspeed
  - wind direction
  - total sky cover
  - mean sea level pressure

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[7] Hourly forecasts are located at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-IEPR-03

[8] "Hourly Load Model" presentation from December 2, 2019. Located at https://efiling.energy.ca.gov/GetDocument.aspx?tn=230924&DocumentContentId=62563

- The individual simulated hourly load ratios associated with each year of weather data that the Commission uses to calculate its 1-in-2, 1-in-10, and 1-in-30 scenarios.[9]

- Population growth estimates.

- Economic growth estimates.

- Other input data, analysis code, and outputs used in the Hourly Load Model process, to the extent it is based on public information.

There are two main benefits to releasing data such as these. First, a shared understanding of the effects of weather on load is invaluable for stakeholders to help perform electric system planning given climate change, which is a stated goal of all California regulatory agencies.[10] For example, it could help inform LSEs' own estimates of their load if they understood how weather-related load spikes are increasing over time. Second, it is especially important as processes such as Integrated Resource Planning extend the planning horizon out to 2035, which intensifies the effects of climate change.[11]

IV. THE COMMISSION SHOULD PUBLICLY POST ITS PLEXOS MODEL TO ALLOW ALL STAKEHOLDERS TO VALIDATE THE RESULTS OF THEIR OWN MODELING AND ENSURE CONSISTENCY IN INPUTS AND ASSUMPTIONS

The Commission performs crucial analysis of system reliability with its PLEXOS modeling in the California Reliability Outlook,[12] in which it runs the PLEXOS model to evaluate reliability

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9 Hourly Load Model at 5.

10 Final 2021 Integrated Energy Policy Report Volume II Ensuring Reliability in a Changing Climate. "The CEC should invest in applied research that supports integration of climate considerations into electric planning, operations, and technology investment. This integration includes improving characterization of the climate conditions under which the grid must reliably operate now and in the future, improving supply and demand forecasting over a range of timescales, and improving situational awareness and forecasting of wildfire-related risks to grid operations." Located at: https://efiling.energy.ca.gov/GetDocument.aspx?tn=241358, at 87.

11 *Administrative Law Judge's Ruling Establishing Process For Finalizing Load Forecasts And Greenhouse Gas Emissions Benchmarks For 2022 Integrated Resource Plan Filings* at 1. Located at: https://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=469615281

12 California Energy Commission Staff Report: Midterm Reliability Analysis at A-2. Located at: https://www.energy.ca.gov/sites/default/files/2021-09/CEC-200-2021-009.pdf

in 2023-2026. It also uses PLEXOS in the IEPR process. While the model is technically publicly available, it is not easily found on the Commission's website. The Commission could, like the California Independent System Operator (CAISO)[13], publicly post a periodically-updated version of its model to give stakeholders visibility into the process and provide feedback. The updates should come with release notes that explain major changes to the database, including fuel price inputs, transmission limits, and generator retirements/additions.

V. CONCLUSION

CalCCA thanks the Commission for its leadership on the California Planning Library, and looks forward to further collaboration on this topic.

Date: May 17, 2022

/s/ Eric Little

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[13] The CAISO's PLEXOS model is located under "Special Reports," located at http://www.caiso.com/market/Pages/ReportsBulletins/Default.aspx