

DOCKETED

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SDG&E Comments on the April 27 CA Planning Library Workshop

Additional submitted attachment is included below.



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California Energy Commission
Docket Unit, MS-4
Docket No. 22-IEPR-02
715 P Street
Sacramento, CA 95814-5512

Subject: SDG&E Comments on the CEC's April 27th IEPR Commissioner Workshop on the California Planning Library (Docket No 22-IEPR-02)

The San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to provide comments in response to the CEC's April 27th IEPR Commissioner Workshop on the California Planning Library. SDG&E commends the CEC on the proposed development of a California Planning Library and fully supports this initiative. While not a trivial task, this effort would benefit all stakeholders that use the CEC's data by providing a central location for the myriad of data and analyses that are currently available to stakeholders in different locations. This will improve the efficiency of stakeholders' modeling and filing processes, while making it less likely that the wrong datasets will be inadvertently used.

Below, we offer specific comments in response to questions posed by CEC staff during their presentations. We also offer additional feedback in response to discussion raised during the workshop and general observations with respect to the CEC's data sources.

Responses to Specific Questions from the CEC Staff's Presentation

For CEC deliverables (regarding existing data sources):

- **What products or datasets do you most frequently use?** SDG&E primarily uses the IEPR load forecast files, including both hourly demand and LSE demand tables.

- **Of the products you utilize, is there a preferred format or geographic level of granularity you would like to see?** We use IEPR load forecasts for hourly grid modeling at the balancing authority level. We would like to continue to have access to hourly load data at the balancing authority level. The current geographic level of granularity is sufficient and preferred for future IEPR load forecasts.
- **How can we make products easier to find?** Products on the CEC website are easy to find, and a central planning library should make that even easier. SDG&E does not have suggestions for additional changes to make products easier to find. Further, considering the use-cases for the data, including planning for critical energy infrastructure (CEII), we recommend on-going review and security as appropriate.
- **Are there ways to make them easier to utilize?** No comments at this time.
- **Are there datasets or products missing?** No comments at this time.
- **Do you have questions about the terminology used?** SDG&E does not have comments on the terminology being used. However, SDG&E agrees with the stakeholder discussion during the workshop indicating that a data dictionary which includes not just the terminology, but also associated technical appendices and assumptions, would be helpful to ensure a common understanding of specific terms. As an example, the CEC IEPR forecast identifies low-/mid-/high-scenarios, but the naming conventions for these scenarios can be confusing as they do not always clearly delineate the relevant components that differ across the scenarios.

Specific to land-use screens:

- **How would you like to see this information presented?** No comments at this time.
- **What features would you like to see incorporated?** No comments at this time.

Additional Feedback

- I. **SDG&E agrees it is critical that confidential information be protected as the CEC evaluates new methods and levels of granularity with which data will be made available to the public.** During the workshop, CEC staff and stakeholders discussed the balance between making detailed data available and ensuring that confidential and/or sensitive information is not inadvertently released. SDG&E appreciates CEC staff's recognition of this important issue. We urge the Commission to be thorough in the process of

reviewing confidential designations and continuing to ensure the appropriate protections are in place as relevant for specific datasets.

- II. SDG&E supports stakeholder suggestions urging the CEC to provide for a regular public release of a PLEXOS model which contains relevant data from the planning library.** While the planning library alone will already be a welcome addition, finding and adapting that data into the appropriate format for modeling is exhaustive and leaves opportunities for mistakes or misinterpretations of how or where certain data should be used. While PLEXOS is not the only tool available, many organizations in California currently use it to perform capacity expansion or production cost modeling, SDG&E included. If the CEC already has a PLEXOS model available, the additional work involved in making it available could have far-reaching benefits. SDG&E cautions, however, that a PLEXOS model must be updated regularly in conjunction with updates to the planning library to prevent obsolete data or assumptions from being inadvertently included. The availability of a model may also make it easier to replicate analyses performed by the CEC; this, in turn, allows stakeholders to answer many questions themselves that would otherwise require iterative engagement with CEC staff.
- III. SDG&E recommends that, going forward, the CEC’s IEPR forecast should extend 15 years into the future and further align with state greenhouse gas policies, to support long-lead transmission planning efforts.**

The CEC’s 10-year IEPR demand forecast term is too short for planning the large, long-lead transmission projects, which can exceed 10 years to permit and construct, that will be needed to meet greenhouse gas (GHG) emissions reduction laws, regulations, and executive orders. Due to the IEPR’s historical focus of a 10-year planning horizon and the CAISO’s reliance on the IEPR modeling to inform its Transmission Planning Process (TPP), SDG&E is concerned that the CAISO’s TPP may not be predicting and initiating the appropriate level of transmission needed to meet the state’s aggressive goals for serving new electric load associated with increased building and transportation electrification.

We were encouraged to see the CEC’s inclusion of a longer-term forecast, out to 2035, as part of the 2021 IEPR. However, we believe that a full 15-year forecast should be the standard term for future IEPRs as it will better support statewide transmission planning needs. Further, we suggest that the CEC provide the CAISO TPP the full 15-year IEPR forecast and ensure sufficient level of policy requirements based on state’s GHG laws, regulations, and executive orders are included in the forecast. In SDG&E’s view, this will help to ensure that the long-lead time transmission upgrades needed to support

the state's GHG laws, regulations, and executive orders are modeled appropriately and approved by the CAISO.

Not approving long-lead time transmission and substation upgrades in a timely manner could lead to delays in meeting the state's GHG reduction policies, as well as reliability issues, and/or cost issues as the state may be left in a position to expedite efforts to catch up to the transmission need.

We look forward to continuing to work with Commission staff as this effort continues. Please do not hesitate to contact me should you have any questions.

Sincerely,

/s/ Sarah M. Taheri

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