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September 1, 2023

California Energy Commission
Docket Office, MS-4
Re: Docket No. 23-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission's IEPR Commissioner Workshop on Load Modifier Scenario Development
Docket No. 23-IEPR-03

Dear Commissioners:

On Friday, August 18, 2023, the California Energy Commission (CEC) hosted a workshop to review data inputs and assumptions for the 2023 Integrated Energy Policy Report (IEPR) energy demand forecast load modifiers and hourly load model. Staff presented updates to the behind-the-meter distributed generation forecast methodology, provided an overview of the use of new climate change data in the forecast, and updates to the "additional achievable" load modifiers like energy efficiency, fuel substitution, and transportation electrification. Southern California Edison (SCE) appreciates the opportunity to submit these comments on the workshop.

SCE especially appreciates the statements made by Vice Chair Gunda communicating the importance of CEC staff considering and incorporating climate change impacts across all demand forecasts – not just as it affects energy consumption. Climate change impacts have broad implications across the state's electricity system, and particularly projected temperature increases affect many aspects of electricity system planning, including all major components of demand forecasts (consumption building electrification, transportation electrification, solar PV generation), generating resources' availability and performance, and grid planning. SCE would like to compliment the Commission staff for their efforts in developing more complex climate change modeling and introducing significant changes to better capture the peak and hourly load forecast impacts from climate change. SCE would like to work more closely with the Commission staff and consultants to better understand and support this area's development.

SCE also appreciates the question raised by Commissioner McAllister about how the state's 6 million heat pump goal by 2030 is reflected in the Building Electrification forecast. SCE supports the inclusion of this goal in CEC's long-term scenario forecasts so the state can plan consistently to meet the goal.

In addition, SCE would encourage the CEC to identify and closely monitor the new types of load growth that CA is likely to experience in the next twenty-plus years. New data centers, load growth projects around the ports, and potential agriculture and industrial electrification loads are good examples highlighting the significant impact the California grid could experience in the future. It would be valuable for the CEC to begin tracking these new load types to ensure appropriate consideration of the associated load impacts in future IEPR forecast updates.

September 1, 2023

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Lastly, SCE would like to complement the special policy-based scenario forecasts that the Energy Commission introduced as part of the 2022 IEPR forecast. However, given the increasing uncertainties associated with accelerated electrification impacts, SCE still faces challenges in meeting significant customer demand at the local planning level due to IEPR demand forecasts not reflecting the increasing load growth during this timeframe. SCE would like to continue working collaboratively with Commission staff to address the unique local planning challenges and ensure timely identification and development of long-lead-time infrastructure projects so that the state will be prepared for meeting its long-term decarbonization and air quality goals.

Over the past decade SCE and CEC forecasting staff have built a strong collaborative working relationship. SCE supports continuing all collaboration efforts. With the everchanging California policies and forecasting needs, the continued collaboration will help provide clarity to the future roadmap to California's success.

SCE thanks the CEC for consideration of the above comments. Please do not hesitate to contact me at Joshua.Copenhaver@sce.com with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Sincerely,

/s/

Joshua Copenhaver