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**SDGE Comments on IEPR Commissioner Workshop, Load Modifier
Scenario Development**

Additional submitted attachment is included below.



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California Energy Commission
Docket Unit, MS-4
Docket No. 22-IEPR-03
715 P Street
Sacramento, CA 95814-5512

SUBJECT: Comments on IEPR Commissioner Workshop on Load Modifier Scenario Development (Docket # 23-IEPR-03)

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) August 18, 2023, Integrated Energy Policy Report (IEPR) Commissioner Workshop on Load Modifier Scenario Development. SDG&E values the CEC and its consultants' efforts to complete detailed analyses that explore several key variables that could significantly impact the demand forecast. The IEPR and demand forecast are integral parts of state agency and energy utility planning efforts.

SDG&E respectfully offers the following areas of feedback for CEC staff's consideration as inputs and assumptions for the forecast scenarios are refined:

- I. The Demand Analysis Working Group (DAWG) should meet to discuss more granular details of inputs and assumptions being considered for the 2023 forecast.**

During the workshop, CEC staff presented information on behind-the-meter self-generation forecasts and hourly load models. Further discussion on this with the DAWG would be helpful; collaboration with the utilities on self-generation data could yield a more robust dataset. In particular, staff noted as part of the improvements to the 2023 forecast its intent to use the National Renewable Energy Laboratory (NREL) Distributed Generation (dGen) model for informing adoption of standalone solar photovoltaics (PV) and PV paired with energy storage. SDG&E would appreciate an opportunity to learn more about the dGen model during a DAWG meeting; such discussion would enable our ability to provide more meaningful feedback and input on how the model compares to the data that we have available.

II. Incorporating modeling for future weather variants and projected climate trends will help calibrate the demand forecast with anticipated impacts of extreme weather events.

SDG&E is generally supportive of the discussed efforts to incorporate modeling for future weather variants and projected climate trends within this year's demand forecast. In recent years, California has witnessed extreme weather events with increasing frequency. As these types of events occur with greater regularity, utilizing historical weather data may not appropriately factor in climate risks that may result in changes in customer load, as well as resource availability. SDG&E is currently exploring the translation and integration of the latest data from California's Fifth Climate Change Assessment,¹ (CMIP6 SSP based scenarios) expected to be released in 2023 and align with the best climate science data.

III. Further clarity on assumptions for Additional Achievable Fuel Substitution (AAFS) and incorporation of zero-emission appliance rules would be helpful for assessing potential demand impacts.

SDG&E acknowledges the inclusion of zero-emission appliance standards with the AAFS structure and throughout the forecast, incorporating discussions from local air districts, the California Air Resources Board, and the CEC's ongoing Title 24 process. Evaluating how these ongoing efforts may impact changes in electricity demand is important. Because many of these proceedings have not yet been fully resolved, understanding the assumptions around the adoption/timing, and impacts to specific regions, will be helpful for identifying areas of policy alignment. SDG&E acknowledges that some information regarding assumptions on this topic was provided during the workshop. Additional information would help utilities better anticipate and prepare for potential changes in demand for their service areas.

Conclusion

Thank you for your consideration of this feedback. SDG&E looks forward to continuing to engage with CEC staff on deepening our understanding the specific details of the inputs and assumptions proposed for use in the 2023 forecast. We greatly appreciate the stakeholder collaboration throughout this process and welcome further discussion. If you have any questions, please contact me at (916) 708-7409 or staheri@sdge.com.

Sincerely,



Sarah M. Taheri
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¹ See [Climate Assessment, Science, and Research - Office of Planning and Research \(ca.gov\)](#) for more information.