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February 14, 2024

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 Revised Energy Demand Forecast, 2023-2040
Docket No. 23-IEPR-03

Dear Commissioners:

On Wednesday, January 31, 2024, the California Energy Commission (CEC) released the revised electricity Demand Forecast, 2023-2040, for the 2023 Integrated Energy Policy Report (IEPR). Revisions include added load from data centers expected in the Bay Area, corrections to electricity rate inputs to the distributed generation adoption forecast, and changes to the hourly load forecast. Southern California Edison (SCE) appreciates the opportunity to submit these comments on the revised Demand Forecast.

SCE compliments the CEC staff for introducing significant modeling changes in this IEPR cycle while managing challenging timelines for IEPR forecast adoption. SCE understands the increasing complexity involved with expanded data sets and new models introduced. Upon close examination of 2023 IEPR forecast changes and the details behind the key driver forecast, SCE has identified some initial concerns around the unexpected forecast changes. SCE appreciates the continuous collaboration between the CEC and SCE forecasting teams to further investigate these issues.

SCE's key concerns include: 1) a declining annual peak demand forecast for SCE's transmission access charge (TAC) area, which shows no return to the 2023 level until after 2031; 2) an aggressive solar PV forecast for SCE territory reflecting higher annual PV capacity expansion for years 2025 to 2032 well above the average annual PV capacity growth SCE experienced in most recent 3 to 5 years prior to Net Billing Tariff became effective in 2023; 3) a change of SCE's system peak hour from early evening (i.e., hour ending (HE) 19) in 2030 under 2022 IEPR to earlier in the day (e.g., HE17) in 2030 under 2023 IEPR, which would make SCE's system much more dependent on behind-the-meter (BTM) PV generation (more than 1500 MW peak reduction in 2030) compared to the previous forecast. SCE believes that these forecast changes are critical for stakeholders to vet thoroughly to ensure that the state builds a reasonable basis for the long-term system and reliability planning. Due to the limited time utilities had to fully vet the 2023 IEPR forecast changes, SCE hopes to continue working closely with the CEC staff to assess and vet these changes that may drive meaningful future IEPR forecast changes.

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SCE thanks the CEC for consideration of the above comments. Please do not hesitate to contact me at (626) 302-0905 or Dawn.Anaiscourt@sce.com or Jennifer.Pezda@sce.com with any questions or concerns you may have. We are available to discuss these matters further at your convenience.

Very truly yours,

/s/

Dawn Anaiscourt