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PG&E Comments RE IEPR Energy Demand Forecast Methodology Updates

Additional submitted attachment is included below.

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13 August 2024

California Energy Commission
Docket Number 24-IEPR-03
715 P Street
Sacramento, CA 95814

RE: CEC IEPR Commissioner Workshop on Energy Demand Forecast Methodology Updates

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Integrated Energy Policy Report (IEPR) Update Commissioner Workshop on Energy Demand Forecast Methodology Updates held on July 30, 2024.

PG&E would first like to express sincere gratitude to the CEC and its partners for tackling the immensely complex task of replacing California's now-outdated historical weather data with downscaled climate modeling data in the IEPR. The ambition, expertise, and collaborative spirit of the team working on this goal will help result in crucial improvements to the California Energy Demand Forecast, and PG&E is eager to contribute what we can throughout the process.

The State's Climate Assessment process has developed a robust dataset of downscaled climate change metrics that are helping to improve both statewide planning and climate-informed decision making. PG&E believes this will support long-term affordability for our customers- both through reduced compliance costs, as noted below, and via more accurate demand forecasts. For instance, PG&E expects that these resources will help California's Investor-Owned Utilities (IOUs) more efficiently meet recent direction from the California Public Utilities Commission to use climate-informed data in our own energy demand forecasting and long-term decision-making processes[1].

Climate-informed electric utility planning is an evolving discipline that will both challenge existing assumptions and provide for a more robust consideration of future ranges of weather conditions and how they may impact electric supply and demand. Given the nascent nature of this type of effort, extra care is needed to develop a strong foundation of shared assumptions and an open and transparent dataset.

Standardization, both of data and of methodologies, will be especially important. Unlike sales and asset data, climate data is intrinsically public; California will save time, money, and effort by developing standardized methodologies for working with these datasets. As such, PG&E would like to request the CEC help drive to consensus regarding data definitions and common statistical measures as well as

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[1] California Public Utility Commission – Climate Adaptation Order Instituting Rulemaking, Decision 24-08-005, Order 2 and Order 3

develop simple self-service access to the data for stakeholders. This is especially important given the increasing breadth of climate data now available from the State's Fifth Climate Assessment via Cal-Adapt and the Analytics Engine.[2] Unless mitigated, the associated cost and complexity of both accessing and working with this information may preclude stakeholders from providing valuable perspectives.

Separately, PG&E would also like to provide feedback on three consumption profile updates mentioned during the workshop:

1. Regarding the new behind-the-meter (BTM) photovoltaic (PV) capacity factor data shared, the lower capacity factor values more closely align with average capacity factors assumed by PG&E in its forecasting. We believe that updating the BTM PV capacity factor assumptions in future IEPR iterations could be a valuable forecasting improvement.
2. PG&E appreciates the CEC sharing new loss factor data. PG&E looks forward to discussing with the CEC, CPUC, CAISO, and other IOUs to better understand these observations.
3. PG&E commends the CEC for analyzing how daily load patterns have evolved in recent years. Electrification, distributed generation, rates, and other variables are having real impacts on how Californians demand energy, and our forecasting must be flexible to accurately represent the current state of electric load.

To conclude, PG&E strongly supports California's continuing efforts to develop more robust climate-informed datasets that can be used to inform utility planning efforts such as Electric Program Investment Charge Program grants[3] and internal demand forecasting. PG&E would appreciate additional detail for how continued CEC efforts will align with these concurrent efforts. We appreciate the opportunity to comment on this IEPR workshop and look forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations

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[2] https://analytics.cal-adapt.org/
[3] EPC-21-037 "Climate-Informed Generation Capacity Modeling to Support a Climate Resilient Transition to a Clean Electricity System" and EPC-21-041 "Climate-Informed Load Forecasting & Electric Grid Modeling to Support a Climate Resilient Transition to Zero-Carbon"