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Demand forecasts should incorporate accurate consumption profiles

Additional submitted attachment is included below.

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350 East Bay
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Napa Climate NOW!

August 13, 2024
California Energy Commission
Docket Log 24- IEPR-3

350 Bay Area is a non-profit organization focused on ensuring a sustainable climate and associated environmental and economic justice for all, with a reach of over twenty-two thousand people, primarily concentrated in the nine Bay Area counties.

This IEPR Workshop is primarily focused on the opportunities for more accurate and sophisticated modeling of climate trends and their impact on electricity demand. However as noted in the concluding presentation, the anticipated consumption profiles are equally important for accurate projections about hourly demand. Slide 14 of the final presentation by CEC shows that current models for CAISO anticipate September peak hour loads that are dramatically higher in 2040 than current consumption. This has serious implications for increasing the cost of electricity in California. CEC plans for future IEPR should address data needed to improve consumption modeling, in addition to improvements in climate projections models.

Specifically, the role of In front of the meter (IFOM) solar generation and storage could play a crucial role in shifting load away from peak hours. Currently these are considered “supply side” resources. In order to accurately project the potential impact of these IFOM resources on demand/consumption profiles, it is essential that the CEC be able to differentiate IFOM resources on the distribution grid from remote resources that require transmission.

Recommendation: obtain necessary data on distribution grid in front of the meter resources and consider potential impact of those resources in IEPR consumption modeling

As California faces these projections of increasing consumption and increasing climate extremes, resilience in the electricity system is important to California residents. Over 95% of outages occur on the distribution grid; resilience can be provided by behind the

meter and in front of the meter generation and storage on the distribution grid as well as strategic decreases in load. Currently no value of resilience is included in the calculation of the cost of DER .

Recommendation: accelerate efforts to quantify the value of resilience on the distribution grid for use in CEC and CPUC modeling

We appreciate the opportunity to participate in these important and urgent discussions.

Claire Broome
Representing 350 Bay Area