

DOCKETED	
Docket Number:	24-IEPR-03
Project Title:	Electricity Demand Forecast
TN #:	259537
Document Title:	Western Power Trading Forum Comments - WPTF Comments on Oct 2 IEPR Commissioner Workshop on Forecast Use in Electricity System Planning
Description:	N/A
Filer:	System
Organization:	Western Power Trading Forum
Submitter Role:	Other Interested Person
Submission Date:	10/15/2024 12:52:16 PM
Docketed Date:	10/15/2024

*Comment Received From: Western Power Trading Forum
Submitted On: 10/15/2024
Docket Number: 24-IEPR-03*

**WPTF Comments on Oct 2 IEPR Commissioner Workshop on
Forecast Use in Electricity System Planning**

Additional submitted attachment is included below.



October 15, 2024

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814
Via docket submission

Re: Docket No. 24-IEPR-3 - Comments on October 2 IEPR Commissioner Workshop on Forecast Use in Electricity System Planning

Dear Chair Hochschild and Vice Chair Gunda,

The Western Power Trading Forum (WPTF) appreciates the opportunity to provide comments to the California Energy Commission (CEC) following the October 2 IEPR Commissioner Lead Workshop. We are grateful for the workshop and the CEC's ongoing efforts to update the IEPR load forecasting methods. The inclusion of diverse perspectives from key stakeholders, such as the CEC, CPUC, CAISO, and LSEs, provided attendees with valuable insights and much to consider regarding the future of energy forecasting. The presentations were excellent, and we commend the CEC's work toward fostering better communication and alignment across agencies, effectively bridging the gap between primary users.

The workshop highlighted the rapidly evolving energy system, driven by both climate change and resource availability, which presents challenges in load forecasting. Some key issues and pain points identified by WPTF from the workshop have more straightforward solutions, while others remain less clear on how to resolve.

WPTF supports the creation of a stochastic data set from the IEPR. The current IEPR only provides a single forecast set, which is inadequate for conducting comprehensive reliability assessments. Both the CPUC RA team and the CEC emphasized the necessity for a stochastic data set, not only for load but also for load modifiers. WPTF supports this recommendation. The CPUC RA team has been working towards updating the Planning Reserve Margin from 0.1 LOLE modeling, but due to the absence of a stochastic data set, they have to create one manually and then adjust it to align with the CEC IEPR forecast. This ad-hoc tuning approach is far from ideal. For consistency, a stochastic data set is crucial. We understand that the IEPR team is aware of this need and is working towards addressing it by 2025. WPTF supports these efforts and seeks clarity on the timeline for providing this comprehensive data.



WPTF supports enhancing data access and aligning modeling methods. There are numerous opportunities to improve communication and access to data. For instance, the CPUC RA team underscored the need to align climate modeling methods with the CEC’s approach. Ava Community Energy has requested access to historical data to facilitate improved modeling as their service area grows. They also requested the underlying climate and weather assumptions for their modeling. Furthermore, the CPUC Slice-of-Day (SOD) presentation suggested that including LSEs in the initial load forecasting process would reduce discrepancies between forecasted and final loads, which would be beneficial for both the CPUC and LSEs.

Enhancing the clarity and validation of inputs with actual data would also be advantageous. As noted in distribution presentations, ‘known load’ projects always exceed IEPR forecasts in the near term. Local-level data and information regarding both the quantity and location of loads could provide important insights. The CAISO transmission presentation further supported this by pointing out that local load growth is often identified by CAISO before it is reflected by the IEPR and TPP. A more efficient communication loop could aid the CEC/IEPR team in understanding or validating near term data.

WPTF supports improving the accuracy of load modifiers. More accurate load modifiers is another resolvable challenge, or, at a minimum an area the CEC has tools for improvement. As a community, we must be proactive, especially considering the continuous growth of Distributed Energy Resources (DERs). The CAISO Flexible Ramp presentation demonstrated that the CEC load modifier BTMPV consistently overestimates actual production, leading to higher Flex Ramp requirements than necessary. WPTF has noted similar discrepancies in previous comments when comparing IEPR forecasts to EMS data. Accurate load modifiers are increasingly vital as DERs expand. We recommend closer collaboration with local teams for precise information and investing in the development of new load modifiers. The CAISO presentation underlined the imminent need for behind-the-meter storage considerations and the impact of Time-of-Use rates on load and consumption patterns. Insights shared during the recent DAWG meeting, where LSEs presented on BTMPV measurement and forecasting methods, and subsequent distribution presentations offer valuable expertise, which can improve near-term forecasting.

WPTF supports additional evaluation of forecast volatility and coordinating agency timelines issues. There are forecasting challenges with less clear solutions,



such as the swings in IEPR load forecasts from one year to the next, which carry downstream consequences. Ava Community Energy and the CPUC SOD team highlighted the challenges these fluctuations pose for resource planning and the potential for costly procurement. The CPUC IRP team noted that such fluctuations impact the RESOLVE build and contribute to shifting CAISO TPP and IRP processes. While there is no immediate solution, working on the aforementioned solvable issues should establish a foundation for reducing forecast volatility.

Similarly, timeline challenges were evident as presentations highlighted concerns over outdated data and data timelines. CAISO and TPP often evaluate local areas and data center growth before these are reflected in the IEPR due to process lags. Additionally, CPUC IRP requires TPP adoption by February for CAISO. The distribution teams expressed concerns that IEPR data is already two years old when it reaches the DPP. While not presented at the workshop, we have experience that the RA process has faced delays to wait for the most current IEPR data. The workshop effectively illustrated the various processes that incorporate IEPR as an input. Producing a comprehensive timeline illustrating when each of these processes occurs and their dependency on the IEPR would be an invaluable tool for stakeholders. WPTF believes that resolving load forecast fluctuations could concurrently mitigate timeline issues, as minor delays in slightly outdated data would be less impactful.

In conclusion, addressing the outlined solvable issues- providing stochastic data, data access and modeling alignment, and improving the accuracy of load modifiers- could significantly enhance forecasting accuracy and timeline synchronization, thereby benefiting all stakeholders. We appreciate the opportunity to provide input and look forward to updates on the progress of these initiatives.

Thank You,

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Via electronic submission.