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PG&E Comments RE IEPR Commissioner Workshop on Forecast Use in Electricity System Planning

Additional submitted attachment is included below.



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

RE: IEPR Commissioner Workshop on Forecast Use in Electricity System Planning

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Integrated Energy Policy Report Update (IEPR) Commissioner Workshop on Forecast Use in Electricity System Planning held on October 2, 2024. We would like to request one change to the CEC's approach to this year's IEPR Update.

Additional Achievable Fuel Substitution (AAFS) load should be disaggregated in the IEPR hourly file into four end use categories: space heating, space cooling, water heating, and all other appliances.

Building on previous asks as detailed in comments filed December 29, 2023, PG&E would like to request the CEC provide a disaggregated view of AAFS end uses contributing to peak demand¹. AAFS is clearly a major driver of peak demand growth during the forecast horizon; as such, it would be helpful for load-serving entity (LSE) planners and forecasters to have more granular insight regarding how different end uses, (e.g., space heating, water heating, space cooling), are expected to contribute to demand.

This is particularly relevant as the CAISO coincident peak forecast has a large impact on reliability modeling in the Integrated Resource Plan (IRP). PG&E noted in our previous comments that "the large increase in AAFS peak impact could significantly change the portfolio selected later in 2024 for development of LSE plans relative to the draft 2023 Preferred System Plan (PSP) published on October 5."

Since then, although LSE Plans were delayed until 2025, the CPUC has used the 2023 IEPR forecast in development of the 2025-2026 CAISO Transmission Planning Process (TPP) system portfolios and noted that "managed net peak load shifts to winter in the early 2040s, also due to increased building electrification."² Results show that "there is more new capacity in this year's recommended base case due to higher peak loads from the IEPR load forecast."³

¹ [PG&E Comments RE IEPR CED Forecast Results Part II Workshop](#)

² Page 4 of "Administrative Law Judge's Ruling Seeking Comments on Electricity Resource Portfolios for 2025-2026 Transmission Planning Process" filed September 12, 2024.

³ *ibid* at page 7

Given that the results of this forecast are materializing in CPUC proceedings, PG&E would like to underscore that additional details regarding AAFS peak demand impacts would help all LSEs understand the change and better prepare for iterative plan filings. Such detail could be shared in the California Energy Demand Forecast hourly files by dividing the AAFS data series into separate line items for four end use categories: space heating, space cooling, water heating, and all other appliances.

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PG&E appreciates the opportunity to comment on this workshop and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
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