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**SDG&E Comments on IEPR Workshop on Forecast Use in
Electricity Planning**

Additional submitted attachment is included below.



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October 16, 2024

California Energy Commission
Docket Office
Docket No. 24-IEPR-03
715 P Street
Sacramento, CA 95814

SUBJECT: SDG&E Comments on October 2, 2024, IEPR Commissioner Workshop on Forecast Use in Electricity System Planning

Submitted electronically to Docket No. 24-IEPR-03

Dear Chair Hochschild and Honorable Commissioners:

San Diego Gas & Electric Company (“SDG&E”) appreciates the opportunity to provide comments in response to the California Energy Commission’s (CEC) October 2, 2024, Integrated Energy Policy Report (IEPR) Commissioner Workshop on Forecast Use in Electricity System Planning. The energy paradigm and electrification efforts in California continue to rapidly evolve, and the energy forecasting efforts continue to grow in complexity. SDG&E appreciates CEC’s continued efforts to expand its forecasting models and refine the scenarios to estimate the potential impacts of load growth.

As was well articulated during the workshop, the IEPR forecasts are a critical input to many of the State’s planning efforts, including but not limited to resource, transmission, and distribution planning. In particular, the discussion pertaining to distribution planning highlighted the differences between system-level forecasts and local (substation bus-level and circuit-level) load growth on the distribution system. Indeed, SDG&E has been improving its disaggregation methodology to better reflect how system-level load forecasts translate to forecast loads at the substation bus and circuit levels. This improved disaggregation coupled with location-specific information on known loads, ensures all loads on SDG&E’s distribution system are planned for and will be safely and reliably served. This top-down/bottom-up approach has proven to be effective and produces circuit-level and substation bus-level load forecasts that can be used in SDG&E’s distribution planning process.

SDG&E strongly supports the CEC’s continued focus on providing **system-level** forecasts. Counter to some of the discussion during the workshop, SDG&E does not see a benefit in having the CEC produce substation bus-level forecasts of specific load forecast components, as the Utilities already have robust methodologies for producing

load forecasts at this level of spatial granularity and provides information on bus-level forecasts as part of the Distribution Planning Process. The CEC's development of substation bus-level forecasts would be duplicative of utility efforts and raises issues around the consistency of planning inputs as well as potential conflicts and confusion over which forecast elements should be used for what purpose. However, SDG&E remains committed to continue sharing its bottom-up forecasts with agency staff and collaborating with the CEC to explore how these location-specific load forecast elements are best reflected in the CEC's system-level IEPR load forecasts.

Conclusion

Thank you for your consideration of these comments. SDG&E looks forward to continuing to engage with the CEC on the development of the forecast and in discussions around its use for important planning processes. Please contact me if you have any questions or are interested in additional information or discussion on this topic.

Sincerely,



Sarah M. Taheri
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