DOCKETED	
Docket Number:	24-IEPR-03
Project Title:	Electricity Demand Forecast
TN #:	260212
Document Title:	SDCP, CEA, SJCE Comments on the IEPR Draft Load Modifier Electricity Demand Forecast Results
Description:	San Diego Community Power, Clean Energy Alliance, and San Jose Clean Energy Comments on the 2024 Integrated Energy Policy Report (IEPR) Draft Load Modifier Electricity Demand Forecast Results
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Organization:	San Diego Community Power
Submitter Role:	Public Agency
Submission Date:	11/21/2024 3:10:57 PM
Docketed Date:	11/21/2024

November 21, 2024

California Energy Commission
Docket No. 24-IEPR-03
715 P Street
Sacramento, CA 95814-5512

RE: Docket No. 24-IEPR-03: 2024 Integrated Energy Policy Report Update (2024 IEPR Update)

San Diego Community Power, Clean Energy Alliance, and San Jose Clean Energy (collectively the Joint CCAs) appreciate the opportunity to provide written comments on the electricity demand forecast load modifiers which will be reflected in the California Energy Commission's (CEC) 2024 Integrated Energy Policy Report (IEPR) Update. The Joint CCAs had the opportunity to review the joint comments of the Solar Energy Industries Association, the Coalition of Community Solar Access, Peninsula Clean Energy, and The Utility Reform Network (collectively the Joint Commenters)[1] prior to their filing in the Docket on November 21, 2024, and strongly support the recommendation that the CEC begin to establish a framework for consideration of distributed front-of-the-meter (FTM) resources, such as community solar + storage, as load modifiers.

Local, distributed energy resources will continue to play an important role in meeting California's clean energy goals while contributing to local reliability, including FTM resources. However, to make such community-scale projects feasible, it is essential that distributed FTM resources are properly valued for the local capacity they provide and can receive resource adequacy (RA) credit. Under the current framework, RA credits for FTM resources are only possible if the resource can receive "deliverability" status through the California Independent System Operator's (CAISO) cluster study process, which has been an observed barrier for distributed resources because the deliverability allocation process is an ill fit for projects of this size (i.e., <5MW).

Providing an alternative path for receiving RA credit through the CEC's load modifying status in the load serving entity peak demand forecast presents an opportunity to support community-scale projects. The Joint CCAs agree with the Joint Commenters that modeling distributed FTM resources as load modifiers does not vary conceptually from the CEC's current practice of

[1] SEIA, CCSA, TURN, PCE Comments on 2024 Integrated Energy Policy Report Update, available at https://efiling.energy.ca.gov/GetDocument.aspx?tn=260202&DocumentContentId=96432

modeling other distributed energy resources as load modifiers. While there may be some necessary changes to the current process for BTM load modifiers, the Joint CCAs encourage the CEC to begin to develop a framework that would consider FTM resources within the existing peak demand forecast process. Such a framework would be well-aligned with the California Public Utilities Commission's (CPUC) creation of a new community renewable energy program adopted by Decision ("D.") 24-05-065, Decision Modifying Green Access Program Tariffs and Adopting a Community Renewable Energy Program.

The Joint CCAs appreciates the opportunity to comment and for the reasons described above support the Joint Commentors recommendation that the CEC begin to establish a framework for consideration of distributed FTM resources as load modifiers.

Sincerely,

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